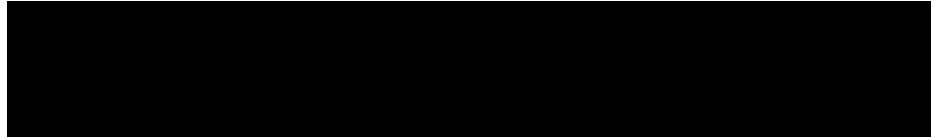


Exhibit 1



GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant/Third-Party Plaintiff.

UNITED STATES
DISTRICT COURT
FOR THE
SOUTHERN DISTRICT
OF NEW YORK

Case No. 22-cv-10904-JSR

JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,

Third-Party Defendant.

**Expert Report of Dr. Kimberly Mehlman-Orozco
CEO of Break the Chain LLC
15920 Fairway Drive
Dumfries, Virginia 22025
(703) 362-9405**

Kimberly Mehlman-Orozco

June 23, 2023¹



¹ I may prepare graphic or illustrative exhibits based on the information reviewed and/or my analyses for use at trial. I reserve the right to amend my analysis, opinions, and this report should additional information be made available.



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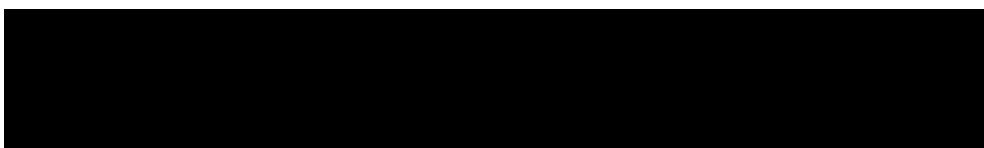


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I. INTRODUCTION

Overview

I have been engaged by JPMorgan Chase Bank, N.A.² in the matter of *Government of the United States Virgin Islands v. JPMorgan Chase Bank, N.A.*, No. 22-cv-10904-JSR (S.D.N.Y) (the Epstein Litigation) to provide opinions as an expert on human trafficking. I am being compensated for my review, analysis, and time in this case, as follows:

- Consultation retainer: \$10,000
- Merits report retainer: \$10,000
- Review, analysis, and consultation: \$750/hour
- Review, analysis, and consultation overtime: \$1,125/hour
- Travel: \$375/hour

My compensation is not contingent upon offering any specific opinions or on the outcome of this matter.

Over the past fifteen years, I have accumulated a variety of work experiences that contribute to my qualifications as an expert on human trafficking (see Appendix A for a copy of my Curriculum Vitae). As the CEO of Break the Chain, LLC and former CEO of Mahn, Mehlman & Associates, LLC, I regularly serve as an expert witness for human trafficking cases (see Appendix B for a list of cases). I also provide *pro bono* expert witness services for human trafficking survivors and currently serve on the advisory network for anti-trafficking non-profit Empower Her Network, where I assisted in building the qualitative measurement tools used by their organization for the last five years.

I am the author of a book on the different forms of human trafficking, which is entitled *Hidden in Plain Sight: America's Slaves of the New Millennium*. For this book, I performed extensive primary and secondary research, including:

1. A systematic review of over 300 human trafficking cases;
2. Content analyses on more than 1,000 media reports of human trafficking arrests;
3. Qualitative interviews of human trafficking victims;
4. Qualitative interviews of convicted human traffickers;
5. Qualitative interviews of consenting sex workers; and
6. Qualitative interviews of commercial sex consumers.

My book was incorporated into the three-day Advanced Human Trafficking Law Enforcement Class curriculum used by ERASE Child Trafficking to train law enforcement in the United States on human trafficking identification and investigation.³ The book also received a variety of

² Herein referred to as JPMorgan or JPMC.

³ For example, San Bernadino County Sheriff's Department, San Bernardino Police Department, City of Fontana Police Department, and Redlands Police Department.

[REDACTED]

advanced praise from experts within the field.⁴

In addition, I formally served as an adjunct human trafficking subject matter expert for RAND Corporation, a non-profit institution that helps improve policy and decision-making through research and analysis, where I worked on three study proposals:

1. Research design to evaluate the National Human Trafficking Hotline;
2. Development of an evidence-based human trafficking risk assessment tool for organizations working with minors; and
3. Evaluating the outcomes of housing services for adult and juvenile human trafficking survivors.

In these capacities, I have had the opportunity to train various law enforcement agencies around the country on my human trafficking research for investigations, including Homeland Security Investigations in Buffalo, New York; Montebello Police Department in Montebello, California; the North Carolina State Bureau of Investigation; and the Royal Canadian Mounted Police in Halifax, Nova Scotia, among others. I have also presented my research at various human trafficking summits and conferences and served on the Greater Prince William County Human Trafficking Task Force (GPWCHTTF) as the data collection sub-committee chair, as well as on the Prince George's County Human Trafficking Task Force. In 2019, I served as an invited panelist for the Police Executive Research Forum's *Critical Issues in Policing Conference—The Police Response to Human Trafficking*, which led to a published report in 2020.⁵

With regards to human trafficking in the erotic massage industry, I have conducted primary research into recruitment and control schemes, advertisements, the mechanics of commercial sex exchanges, and the distinction between sex trafficking and consenting commercial sex. Various aspects of my research have been presented to law enforcement agencies, including but not limited to special agents for Homeland Security Investigations in Buffalo, New York; fire marshals in Fairfax, Virginia; and law enforcement officers in Martin County and Palm Beach County.

In addition to my work on human trafficking, I have received formal training, as well as quantitative and qualitative research experience, during my graduate coursework at George Mason University. Specifically, I served as a research associate on the Trinidad and Tobago Crime Reduction Project, which involved government-sanctioned surveys of both police officers and members of the community in Trinidad. I also led participant outreach for the Office of Juvenile Justice and Delinquency Prevention (OJJDP) Census of Juveniles on Probation and served as the Clinical Trial Search Coordinator for the Cochrane⁶ Justice Health Field.

⁴ For example, from Louise I. Shelley, Omer L. and Nancy Hirst Professor of Public Policy at the Schar School of Policy and Government at George Mason University in Virginia and Director, Terrorism, Transnational Crime and Corruption Center and John Cotton Richmond, Former Federal Human Trafficking Prosecutor and Founding Director of the Human Trafficking Institute.

⁵ Police Executive Research Forum (PERF), *How Local Police Can Combat the Global Problem of Human Trafficking: Collaboration, Training, Support for Victims, and Technology Are Keys to Success*, (2020), <https://www.policeforum.org/assets/CombatHumanTrafficking.pdf>.

⁶ The Cochrane Library is a collection of high-quality, independent evidence to inform healthcare decision-making.

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In addition to my practical and research experience, I also formally taught about human trafficking as part of my course material at George Mason University and at University of Maryland, College Park, the #1 ranked criminology doctoral program in the nation.⁷

I hold a Ph.D. in Criminology, Law and Society from George Mason University, as well as a M.S. in Justice, Law, and Crime Policy and a B.S. *cum laude* in Administration of Justice.

My research on the efficacy of anti-trafficking interventions has been published in the *Journal of Social Inclusion*,⁸ which was guest edited by leading human trafficking expert Siddharth Kara, an Adjunct Lecturer at Harvard University and author of “Sex Trafficking: Inside the Business of Modern Slavery.” My qualitative interviews with convicted human traffickers were also published in the journal *Trends and Organized Crime*.⁹ Additionally, my work has also been published through magazines such as the *Diplomatic Courier*¹⁰ and in media outlets, such as *USA Today*,¹¹

⁷ While at University of Maryland, College Park, I contributed to and was named as a faculty member for the U.S. Department of Homeland Security, U.S. Customs and Border Protection, CBP Leadership Institute grant proposal, which was awarded in 2014.

⁸ Kimberly Mehlman-Orozco, *Safe Harbor Policies for Juvenile Victims of Sex Trafficking: A Myopic View of Improvements in Practice*, 3 Soc. Inclusion 52 (2015).

⁹ Kimberly Mehlman-Orozco, *Projected Heroes and Self-Perceived Manipulators: Understanding the Duplicitous Identities of Human Traffickers*, 23 Trends in Organized Crime 95, 105-106 (2017).

¹⁰ See, e.g., Kimberly Mehlman-Orozco, *America’s Symbolic, Not Effective, Anti-Trafficking Policy*, Diplomatic Courier (May 31, 2016), <https://www.diplomaticcourier.com/posts/americas-symbolic-not-effective-anti-trafficking-policy>; Kimberly Mehlman-Orozco, *Sex Slaves or Prostitutes?: How Human Trafficking is Hidden in Plain Sight in America’s Capital*, Diplomatic Courier (May 4, 2016), <https://www.diplomaticcourier.com/posts/sex-slaves-prostitutes-human-trafficking-hidden-plain-sight-americas-capital>; or Kimberly Mehlman-Orozco, *Devoid of Research: An Evaluation of Human Trafficking Interventions*, Diplomatic Courier (Mar. 18, 2014), <https://www.diplomaticcourier.com/posts/devoid-of-research-an-evaluation-of-human-trafficking-interventions>.

¹¹ See, e.g., Kimberly Mehlman-Orozco, *Jeffrey Epstein’s deal with Alexander Acosta wasn’t out of line with what I have seen*, USA Today (July 10, 2019), <https://www.usatoday.com/story/opinion/2019/07/10/jeffrey-epstein-alexander-acosta-donald-trump-sex-trafficking-agreement-column/1686687001/>; and Kimberly Mehlman-Orozco and William Snyder, *Robert Kraft spa scandal: Sex trafficking is hard to prove, that doesn’t mean it’s a lie*, USA Today (Apr. 4, 2019), retrieved from: <https://www.usatoday.com/story/opinion/2019/04/04/robert-kraft-lawyers-sex-trafficking-conviction-difficult-column/3325857002/>.



Politico,¹² *The Houston Chronicle*,¹³ *The Hill*,¹⁴ *The Washington Post*,¹⁵ *The Baltimore Sun*,¹⁶ *The*

¹² See, e.g., Kimberly Mehlman-Orozco, *How to Fight Sex Trafficking*, Politico (Feb. 24, 2019), retrieved from: <https://www.politico.com/magazine/story/2019/02/24/sex-trafficking-225203/>.

¹³ See, e.g., for example, Kimberly Mehlman-Orozco and Simon Hedlin, *Mehlman-Orozco, Hedlin: Stop criminalizing victims of sex trafficking*, Houston Chronicle (Jan. 19, 2017), <https://www.houstonchronicle.com/opinion/outlook/article/Mehlman-Orozco-Hedlin-Stop-criminalizing-10869881.php>.

¹⁴ See, e.g., Kimberly Mehlman-Orozco and William D. Snyder, *Legalizing prostitution could end sex-trafficking investigations*, The Hill (March 19, 2019), retrieved from: <https://thehill.com/opinion/criminal-justice/434272-legalizing-prostitution-could-end-sex-trafficking-investigations/#:~:text=Research%20suggests%20that%20legalization%20would,it%20would%20hamper%20trafficking%20investigations>; Kimberly Mehlman-Orozco, *Trafficking victims get lost under unjust criminal convictions*, Hill (Dec. 8, 2017), retrieved from: <https://thehill.com/opinion/civil-rights/363902-trafficking-victims-get-lost-under-unjust-criminal-convictions/>; Kimberly Mehlman-Orozco, *Decriminalize sex work to bring trafficking victims out of the shadows*, The Hill (Oct. 21, 2017), <https://thehill.com/opinion/civil-rights/356512-decriminalize-sex-work-to-bring-trafficking-victims-out-of-the-shadows/>; Kimberly Mehlman-Orozco, *Sex Trafficking is often hidden in plain sight*, Hill (Oct. 21, 2016), <https://thehill.com/blogs/pundits-blog/immigration/302150-sex-trafficking-is-often-hidden-in-plain-sight/>; and Kimberly Mehlman-Orozco, *What happens after a human trafficking victim is ‘rescued’?*, Hill (July 29, 2016), <https://thehill.com/blogs/congress-blog/judicial/289709-what-happens-after-a-human-trafficking-victim-is-rescued/>.

¹⁵ See, e.g., Kimberly Mehlman-Orozco, *Decriminalizing sex work would help bring victims out of the shadows*, The Washington Post (Dec. 20, 2017), https://www.washingtonpost.com/opinions/decriminalizing-sex-work-would-help-bring-victims-out-of-the-shadows/2017/10/20/4b7d8be8-b38a-11e7-9b93-b97043e57a22_story.html; and Kimberly Mehlman-Orozco, *Vilifying Backpage.com won’t help fight sex trafficking*, Wash. Post (July 18, 2017), https://www.washingtonpost.com/opinions/vilifying-backpagecom-wont-help-fight-sex-trafficking/2017/07/18/101b0d34-6b12-11e7-abbc-a53480672286_story.html.

¹⁶ See, e.g., Kimberly Mehlman-Orozco, *Sex trafficking bill likely to do more harm than good*, The Baltimore Sun (March 22, 2018), <https://www.baltimoresun.com/opinion/op-ed/bs-ed-op-0323-fosta-trafficking-20180322-story.html>; Kimberly Mehlman-Orozco, *What every parent should know about sex trafficking*, Baltimore Sun (Mar. 28, 2017), <https://www.baltimoresun.com/opinion/op-ed/bs-ed-sex-trafficking-20170328-story.html>; and Kimberly Mehlman-Orozco, *Consenting prostitutes or trafficked victims?*, Baltimore Sun (June 19, 2016), <https://www.baltimoresun.com/opinion/op-ed/bs-ed-sex-trafficking-20160619-story.html>.

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Crime Report,¹⁷ Thomson Reuters,¹⁸ and others. Moreover, I am frequently interviewed and consulted by the media on topics related to human trafficking; for example, most recently by *Forbes*,¹⁹ as well as by CNN, NBC, CBS, Fox News, among others.

I also serve as a peer-reviewer for empirical research articles on human trafficking, for example with the *Journal of Human Trafficking* and *American Journal of Evaluation* and I serve as a peer-reviewer for grant applications for human trafficking research. Most recently, I was invited by the *Journal of Human Trafficking* to review a manuscript entitled “*A Quasi-Experimental Intervention Trial to Test the Efficacy of a Human Trafficking Awareness Campaign: The Blue Campaign*.” Additionally, in June 2022, I served as an invited peer-reviewer for the U.S. Department of Justice, Office of Justice Programs, National Institute of Justice Research and Evaluation on Trafficking in Persons. Previously, I was invited by the Office of Justice Programs and National Institute of Justice to serve as a peer-reviewer for FY 2020 Research on Law Enforcement Responses to Sex Trafficking of Minors.

With regards to the present matter and in full disclosure, it should be noted that in October 2020 Assistant United States Attorney for the Southern District of New York Alison Moe reached out

¹⁷ See, e.g., Jennifer Lowery-Keith and Kimberly Mehlman-Orozco, ‘*Justice Denied*’: A Sex Trafficking Survivor Tells Her Story, *Crime Rep.* (Feb. 28, 2022), <https://thecrimereport.org/2022/02/28/justice-denied-a-sex-trafficking-survivor-tells-her-story/>; Kimberly Mehlman-Orozco and Greg Bristol, *Suing Social Media Sites Won’t Curb Sex Trafficking: Advocates*, *The Crime Report* (Nov. 30, 2021), <https://thecrimereport.org/2021/11/30/suing-social-media-sites-wont-curb-sex-trafficking-advocates/>; Kimberly Mehlman-Orozco and Marisa Trasatti, *Does ‘Nirvana’ Lawsuit Undermine Struggle Against Trafficking?*, *Crime Rep.* (Aug. 31, 2021), retrieved from: <https://thecrimereport.org/2021/08/31/does-nirvana-lawsuit-undermine-struggle-against-trafficking/>; Kimberly Mehlman-Orozco, *The ‘Racialization’ of Sex Trafficking in America*, *Crime Rep.* (May 4, 2021), retrieved from: <https://thecrimereport.org/2021/05/04/1294014/>; Kimberly Mehlman-Orozco, *COVID-19, the Commercial Sex Industry and Sex Trafficking*, *The Crime Report* (Mar. 22, 2021), <https://thecrimereport.org/2021/03/22/covid-19-the-commercial-sex-industry-and-sex-trafficking/>; Kimberly Mehlman-Orozco, *Why the Stop Enabling Sex Traffickers Act is the Wrong Solution*, *Crime Rep.* (Sept. 13, 2017), retrieved from: <https://thecrimereport.org/2017/09/13/why-the-stop-enabling-sex-traffickers-act-is-the-wrong-solution/>; Kimberly Mehlman-Orozco, *Child Trafficking: The Tragedy of ‘Princess’*, *The Crime Report* (July 10, 2017), <https://thecrimereport.org/2017/07/10/child-trafficking-the-tragedy-of-princess/>; Kimberly Mehlman-Orozco, *Hunting the Internet’s Sex Predators*, *Crime Rep.* (June 14, 2017), retrieved from: <https://thecrimereport.org/2017/06/14/hunting-the-internets-worst-predators/>; Kimberly Mehlman-Orozco, *Sex Trafficking: A Surprising Rescue Story*, *Crime Rep.* (May 17, 2017), retrieved from: <https://thecrimereport.org/2017/05/17/sex-trafficking-a-surprising-rescue-story/>; and Kimberly Mehlman-Orozco, *Why Do We Criminalize Young Victims of Sex Trafficking?*, *Crime Rep.* (Jan. 17, 2017), <https://thecrimereport.org/2017/01/17/why-do-we-criminalize-young-victims-of-sex-trafficking/>.

¹⁸ Kimberly Mehlman-Orozco, *Why cracking down on websites won’t stop online sex trafficking*, Thomson Reuters Foundation (Mar. 2, 2018), <https://news.trust.org/item/20180302174534-se03q/>; Kimberly Mehlman-Orozco, *Why we should question the FBI’s recent human trafficking sting*, Thomson Reuters Found.(Oct. 24, 2017), <https://news.trust.org/item/20171024161910-x96o5>; Kimberly Mehlman-Orozco, *To sue or not to sue third-party businesses for sex trafficking?*, Thomson Reuters Found. (July 3, 2017), retrieved from: <https://news.trust.org/item/20170703203545-k6b8z>; and Kimberly Mehlman-Orozco, *Will shutting down Backpage.com end the scourge of child sex trafficking in America?*, Thomson Reuters Found. (May 30, 2017), retrieved from: <https://news.trust.org/item/20170530154532-pjag0>.

¹⁹ Thomas Brewster, *Sex Traffickers Used America’s Favorite Family Safety App To Control Victims*, *Forbes* (April 6, 2023), <https://www.forbes.com/sites/thomasbrewster/2023/04/06/sex-traffickers-use-parenting-apps-like-life360-to-spy-on-victims/?sh=92d15c864c3a>.

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to me, along with her colleagues Lara Pomerantz and Maurene Comey, to discuss my availability to testify at the trial of *United States v. Ghislaine Maxwell*; however, I was not ultimately retained on that case. Additionally, I issued a class certification report in the matter of *Jane Doe 1 v. JPMorgan Chase Bank, N.A.*

At present, I have testified in court for a total of ten cases:

1. Five cases in state criminal court in California²⁰;
2. One case in federal criminal court in California²¹;
3. One case in federal criminal court in New Mexico²²;
4. One case in state criminal court in New York²³;
5. One case in state criminal court in Virginia²⁴; and
6. One case in federal civil court in Virginia.²⁵

I have also sat for depositions for a total of seven civil cases:

1. Three cases in state civil court in Georgia;
2. One case in federal civil court in New York;
3. One case in federal civil court in Virginia;
4. One case in federal civil court in California; and
5. One case in federal civil court in Oklahoma.

Additionally, there are four orders recognizing the admissibility of my expert witness testimony:

1. One case in federal civil court in Virginia²⁶;
2. Two cases in federal criminal court in New Mexico; and
3. One case in federal criminal court in California.

²⁰ All five were at trial.

²¹ Trial.

²² At a Daubert hearing only, where I was admitted. Case was resolved through plea bargain.

²³ At Frye hearing only for another expert, Chitra Raghavan.

²⁴ At a Daubert hearing only, where I was admitted, but court did not issue a written order.

²⁵ Trial.

²⁶ Note: I was also admitted in state court in Virginia, but the challenge was withdrawn before an order was issued.

II. DEFINITIONS

In order to facilitate precision in language, which is undoubtedly important when evaluating the present claims, I proffer the following definitions, which reflect either a commonly accepted understanding of key concepts in the sex trafficking literature or social scientific research, or definitions from the United States Code and New York Penal Code, as referenced in my report.

Labor Trafficking: The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.²⁷

Sex Trafficking: The recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act and in which the commercial sex act is induced by force, fraud, or coercion or in which the person induced to perform such act has not attained 18 years of age.²⁸

Commercial Sex Act: Any sex act on account of which anything of value is given to or received by any person.²⁹

Sexual Harassment: Sexual harassment may be verbal, visual, and/or physical, including:

- Sexually offensive remarks or jokes;
- Unwanted touching or groping;
- Coerced sex acts;
- Requests for sexual favors of a sexually suggestive nature (e.g., asking employee to dig coins out of a supervisor's pants pocket);
- Displaying pornographic images;
- Comments (either complimentary or derogatory) about a person's gender or sexual preferences;
- Sexual gestures (e.g., pantomiming sex acts).³⁰

Sexual Misconduct: A person is guilty of sexual misconduct when:

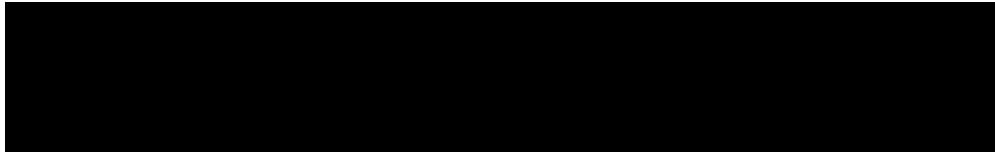
1. He or she engages in sexual intercourse with another person without such person's consent; or
2. He or she engages in oral sexual conduct or anal sexual conduct with another person without such person's consent; or

²⁷ This definition is based on a prong of the term “[s]evere forms of trafficking in persons” from 22 U.S.C. § 7102(11)(B).

²⁸ 22 U.S.C. § 7102(11)(A), (12).

²⁹ 22 U.S.C. § 7102(4).

³⁰ Att'y Gen. of N. Y., *Sexual Harassment: In The Workplace: Know Your Rights*, https://ag.ny.gov/sites/default/files/sexual_harassment_brochure.pdf (last accessed Mar. 15, 2023).

- 
3. He or she engages in sexual conduct with an animal or a dead human body.³¹

Rape: A person is guilty of rape in the first degree when he or she engages in sexual intercourse with another person:

1. By forcible compulsion; or
2. Who is incapable of consent by reason of being physically helpless; or
3. Who is less than eleven years old; or
4. Who is less than thirteen years old and the actor is eighteen years old or more.³²

Coercion: the term “coercion” means: (A) threats of serious harm to or physical restraint against any person; (B) any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or (C) the abuse or threatened abuse of the legal process.³³

Exploit: Benefit unfairly from the work of (someone), typically by overworking and underpaying them.

Venture: Defined in Section 1591(e)(6) of the TVPA as “any group of two or more individuals associated in fact, whether or not a legal entity.”³⁴

Ecological Fallacy: Inferences about the characteristics/behavior of individuals are derived from inferences about the group to which the individuals belong.³⁵

Fallacy of Composition: The error of assuming that what is true of a member of a group is true for the group as a whole.

Facilitate: To make (an action or process) easy or easier.

Sensitivity: The ability of law enforcement, service providers, and other third parties to correctly identify true victims of human trafficking (true positive).

Specificity: The ability of law enforcement, service providers, and other third parties to correctly identify persons who are not victims of human trafficking (true negative).

Methodology: The specific methods, procedures, or practices needed to derive or interpret data within the scope of a particular discipline.

Reliability: The degree to which the result of a methodology can be depended on to be accurate

³¹ N.Y. Penal Law §130.20.

³² N.Y. Penal Law § 130.35.

³³ 22 U.S.C. § 7102(3).

³⁴ 18 U.S.C. § 1591(e)(6); *Noble v. Weinstein*, 335 F. Supp. 3d 504, 524 (S.D.N.Y. 2018).

³⁵ J.T. Walker, “Ecological fallacy,” 2 Encyclopedia of Rsch. Methods in Criminology and Crim. Just., 478-482 (2021).

(e.g., through the overall consistency of a measure by using a statistical approach).

Narrative Review or Literature Review: A descriptive and subjective summary of literature on a specific topic.

Systematic Review: A structured, rigorous, and replicable examination of the literature on a specific topic.

Boolean Search Phrase: A combination of keywords alongside specific words (e.g., AND, OR, NOT, NEAR) and symbols (e.g., *, ~, -) known as Boolean operators used limit or expand search results in a review of literature.

Confirmation Bias: The tendency to process information by looking for, or interpreting, information that is consistent with an existing belief.

Hindsight Bias: The tendency, upon learning an outcome of a criminal case to overestimate a third party's ability to have foreseen the crime.

Secondary Exploitation: The act of making use of or benefiting from a human trafficking survivor's victimization or the human trafficking phenomenon.³⁶

³⁶ See, e.g., Kimberly Mehlmann-Orozco, *Hidden in Plain Sight: America's Slaves of the New Millennium* 199 (2017) and Claudia Cojocaru. *My experience is mine to tell: Challenging the abolitionist victimhood framework.* 7 Anti-Trafficking Review 12 (2016).

III. SUMMARY OF OPINIONS³⁷

1. Although Epstein's crimes are atypical of human trafficking, based on the allegations in the public record, it is undeniable that Epstein was a sexual predator, who engaged in illicit behavior to the physical and emotional detriment of an unknown number of women and children.
2. Based on my expertise on human trafficking, it is more likely than not that many of Epstein's crimes could have been prevented if law enforcement had intervened when they were first contacted.
3. There is no evidence to suggest that Epstein's crimes would have been prevented if his business relationship with JPMC ended sooner.
4. There is no evidence to suggest that Epstein's crimes would have been prevented if JPMC [REDACTED]
5. In the absence of an overt disclosure, sex trafficking is a clandestine crime and as a result victims can be difficult to identify and are frequently misidentified, even by trained law enforcement, social workers, and healthcare providers.
6. As a consequence of misidentification, sex trafficking victims, including minors, are often erroneously criminalized by the judicial system and denied services.
7. Epstein's sexual victimizations involving illicit massage were atypical of a sex trafficking operation and therefore, to a reasonable degree of social scientific certainty, these victimizations were more difficult to detect by third parties in the absence of law enforcement intervention.
8. Claims of alleged sex trafficking, especially those made by third parties against third parties, are at high risk of secondary exploitation.
9. I am not aware of any reliable or generally accepted empirical research to estimate the prevalence of sex trafficking encountered by financial institutions in the United States.
10. Indicia of "sex trafficking" in the banking industry have not been adequately evaluated for sensitivity or specificity.
11. Based on my expertise on human trafficking, the financial services industry has been lauded for its innovative and proactive efforts to meet the challenge of addressing trafficking and staying abreast of diverse forms of trafficking and shifting patterns.
12. Based on my expertise on human trafficking, the policies, procedures, and internal controls used by JPMC were consistent with those employed by others in the financial services industry.
13. While the purported "best practice" indicia of sex trafficking for the financial services industry are not supported by reliable empirical research, they are not consistently evident in the present case, which illustrates the atypicality of the present allegations. For example:
 - a. There is no evidence that Epstein or anyone associated with him took control of the prospective class members' respective financial identity.

³⁷ All of my opinions are stated to a reasonable degree of social scientific certainty in my profession as an expert in human trafficking and Ph.D. educated criminologist.

- [REDACTED]
 - b. There is no evidence that Epstein or anyone associated with him took control of the prospective class members' respective banking products in a manner that is consistent with human trafficking (e.g., long-term confiscation for the purpose of exploitation³⁸).
 - c. There is no evidence that Epstein or anyone associated with him limited or prevented the prospective class members' respective access to any financial system.
 - d. There is no evidence that Epstein or anyone associated with him spoiled the prospective class members' respective credit record.
 - e. There is no evidence that Epstein or anyone associated with him used prepaid credit cards to conceal their illicit activities.
 - f. There is no evidence that Epstein or anyone associated with him used cryptocurrencies to conceal their illicit activities.
 - g. There is no evidence that Epstein or anyone associated with him attempted to conceal the true originator or beneficiary of his payments.
14. While the purported “best practice” indicia of sex trafficking for the massage industry are not supported by reliable empirical research, they are not consistently evident in this case and/or there is no evidence to suggest JPMC knew or should have known. For example, with regards to the asserted indicia of trafficking for outcall and/or home-based massage:
- a. There is no evidence that the alleged victims worked at a massage business where the front door was locked and customers could only enter if “buzzed in” or enter through back or side doors that were more discreet;
 - b. There is no evidence that the alleged victims worked at a massage business where the windows were covered, so passersby could not see into the establishment;
 - c. There is no evidence that Epstein paid significantly below market level for massages, in fact he paid well above market level for massages;
 - d. There is no evidence that the alleged victims demanded a large tip or expressed distress if they did not receive a large tip after a massage or that JPMC knew or should have known of this;
 - e. There is no evidence that the alleged victims served Epstein or anyone associated with him for “excessive hours” or were “on call at all times,” in fact [REDACTED] declined meeting with Epstein on multiple occasions;
 - f. While there is some evidence that certain alleged victims who performed massages only served male clientele, there is no evidence that JPMC knew or should have known of this;
 - g. There is no evidence that there was a regular rotation of women (e.g. new women coming in every several weeks). In fact, [REDACTED] and other alleged victims were demonstrably in relationships with Epstein for years; and
 - h. There is no evidence tying the allegations to advertisements on commercial sex websites (e.g., Rubmaps.com).

³⁸ For example, Epstein set up accounts for [REDACTED] but evidence suggests that she maintained control and use over the accounts for the duration of their existence. See, e.g., JPM-SDNYLIT-00030057.

- [REDACTED]
15. Based on my expertise on human trafficking, typically traffickers do not pay victims of sex trafficking. In fact, the absence of money, withholding of money, and/or confiscation of money is more commonly referred to as a purported indicum.
 16. I am not aware of any reliable or generally accepted empirical research to suggest that “large, regular cash withdrawals” are a reliable indicum of sex trafficking.
 17. To a reasonable degree of social scientific certainty, reporting large cash withdraws to law enforcement would not have had a statistically significant effect on the prevalence of sex trafficking or the identification of victims or offenders.
 18. To a reasonable degree of social scientific certainty, there is no evidence to suggest that a change in JPMC’s [REDACTED] would have led to the identification of Epstein’s victims or to an intervention or prevention to Epstein’s crimes.
 19. I am not aware of any reliable or generally accepted empirical research to suggest that “round-dollar wire payments” are a reliable indicum of sex trafficking.
 20. To a reasonable degree of social scientific certainty, [REDACTED] would not have had a statistically significant effect on the prevalence of sex trafficking or the identification of victims or offenders.
 21. To a reasonable degree of social scientific certainty, there is no evidence to suggest that a change in [REDACTED] would have led to the identification of Epstein’s victims or to an intervention or prevention to Epstein’s crimes.
 22. Based on my review of the evidence and testimony in this case, as well as my research, education, and experience, there are no reliable data to suggest that Epstein and his alleged co-conspirators would not have been able to victimize women and girls without JPMC’s financial infrastructure. Any suggestion otherwise is based on misinformation, unsupported speculation or subjective belief, ecological fallacies, or fallacies of composition, and is counterfactual.

The following sections of this report provide a summary and further explanation as to the evidentiary, empirical, and theoretical basis for each of the aforementioned opinions:

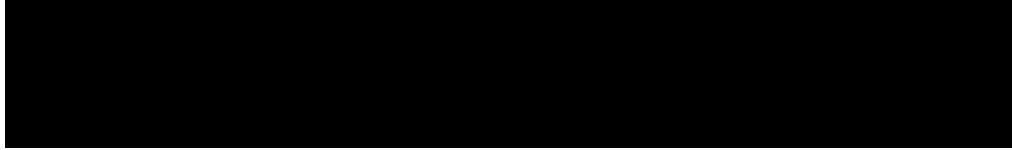
Section IV. Summarizes the crimes committed by Epstein and the associated claims against JPMC;

Section V. Provides an overview on human trafficking and explores the challenges related to identification and intervention;

Section VI. Conceptualizes human trafficking misidentifications as sentinel events;

Section VII. Examines the data, interventions, and indicia of sex trafficking and commercial sex in the private sector;

Section VIII. Highlights best practices in the financial services industry;



Section IX. Reviews actual or constructive knowledge standards regarding third-party liability trafficking claims;

Section X. Rebutts the testimony of the Plaintiff's Named Experts;

Section XI. Discusses secondary exploitation of human trafficking; and

Section XII. Summarizes the opinions in the conclusion.

IV. JEFFREY EPSTEIN

Opinion

Jeffrey Epstein was indicted for sex trafficking in 2019, six years after his business relationship with JPMC ended. Although Epstein's crimes are atypical of human trafficking, based on the allegations in the public record, it is undeniable that Epstein was a sexual predator, who engaged in illicit behavior to the physical and emotional detriment of an unknown number of women and children. Many of Epstein's crimes could have been prevented if law enforcement had intervened when they were first contacted in 1996 or if Epstein had been prosecuted for trafficking when law enforcement was contacted again in 2005. However, there are no facts in evidence to suggest that Epstein's crimes would have been prevented if his business relationship with JPMC ended sooner

[REDACTED] in fact, the exact opposite is true, as his alleged crimes continued for six years after the cessation of his business relationship with JPMC [REDACTED]

[REDACTED] Epstein's crimes also continued for 20 years after law enforcement was first contacted by [REDACTED] and for 13 years after Epstein was first indicted, without intervention from any governmental authority including officials of the United States Virgin Islands.

Basis

No party involved in the present matter contests that Epstein victimized women and children. What is contested, however, can be summarized as follows:

1. Whether Epstein's crimes are typical of trafficking or other forms of sexually-based offenses;
2. Whether all women who allege to be victims of Epstein are in fact victims, as opposed to co-conspirators;
3. Whether there were evidence-based indicia of trafficking that JPMC knew or should have known; and
4. Whether Epstein's business relationship with JPMC facilitated his crimes.

The Plaintiff and the Plaintiff's named experts allege that:

1. Epstein's crimes are typical of trafficking; yet, they provide no reference to any case, research, or academic authority to support this claim;
2. All women who allege to be victims of Epstein are in fact victims, while ignoring the fact that some of these women have been publicly accused by both law enforcement and other Epstein survivors of being co-conspirators;
3. JPMC knew or should have known of trafficking indicia related to Epstein, despite the fact that there is no evidence-base to support these purported indicia and law enforcement failed to intervene; and

- [REDACTED]
4. Epstein's business relationship with JPMC facilitated his crimes, even though there is no evidence to support this claim and, to the contrary, these alleged crimes occurred before the business relationship began and after the business relationship ended.

While the lack of evidence-base for the claims made by the Plaintiff and the Plaintiff's named experts are discussed further in the sections below, it is important to remember that Epstein was not indicted for sex trafficking until 2019, six years after the JPMC banking relationship with Epstein ended, and for allegations related to pre-2006 conduct.

Moreover, while overt disclosures of sexual abuse and molestation were repeatedly made to multiple other entities, such as the Federal Bureau of Investigation (FBI),³⁹ New York Police,⁴⁰ Palm Beach Police⁴¹ and *Vanity Fair*,⁴² at no time did any victim make an overt disclosure to any JPMC employee. The only entities who were truly in a position to know about the full extent of Epstein's crimes, but failed to intervene, were members of law enforcement and officers of the court in Florida and New York. In fact, Epstein survivors, such as [REDACTED] have publicly blamed these entities for allowing Epstein's abuses to continue.⁴³

With that being said, no party involved in the present matter contests that JPMC was made aware that Epstein was convicted of prostitution of a minor in 2008. Following his conviction, JPMC appropriately and consistently with industry standards categorized Epstein as a "high risk" client and increased the monitoring and [REDACTED]

At the time of Epstein's conviction in 2008, law enforcement overwhelmingly did not understand "prostitution of a minor" to be synonymous with sex trafficking.⁴⁴ However, the Plaintiff and the Plaintiff's named experts make this leap of logic without any citation or reference.⁴⁵ It is unclear why the Plaintiff and the Plaintiff's named experts insist on imparting an interpretation onto JPMC that was demonstrably not consistent with what was understood by law enforcement at the time, much less the American public and the private sector.

³⁹ Mike Baker, *The Sisters Who First Tried to Take Down Jeffrey Epstein*, N.Y. Times (Aug. 26, 2019), retrieved from: [https://www.nytimes.com/2019/08/26/us/epstein-\[REDACTED\]-maxwell.html](https://www.nytimes.com/2019/08/26/us/epstein-[REDACTED]-maxwell.html). See also Dep't of Just., Office of Pro. Resp., *Investigation Into the U.S. Attorney's Office for the Southern District of Florida's Resolution of Its 2006-2008 Federal Criminal Investigation of Jeffrey Epstein and Its Interactions with Victims during the Investigation* (OPR Report), 225.

⁴⁰ Mike Baker, *The Sisters Who First Tried to Take Down Jeffrey Epstein*, N.Y. Times (Aug. 26, 2019), retrieved from: [https://www.nytimes.com/2019/08/26/us/epstein-\[REDACTED\]-maxwell.html](https://www.nytimes.com/2019/08/26/us/epstein-[REDACTED]-maxwell.html). See also DANY0002.

⁴¹ OPR Report, 11-14.

⁴² Mike Baker, *The Sisters Who First Tried to Take Down Jeffrey Epstein*, N.Y. Times (Aug. 26, 2019), retrieved from: [https://www.nytimes.com/2019/08/26/us/epstein-\[REDACTED\]-maxwell.html](https://www.nytimes.com/2019/08/26/us/epstein-[REDACTED]-maxwell.html).

⁴³ Kate Briquet, *Epstein Victim Demands FBI Investigate Its Failure to Stop Him*, Daily Beast (May 2, 2023), retrieved from: [https://www.thedailybeast.com/epstein-victim-\[REDACTED\]-demands-fbi-investigate-its-failure-to-stop-him](https://www.thedailybeast.com/epstein-victim-[REDACTED]-demands-fbi-investigate-its-failure-to-stop-him).

⁴⁴ See *Infra* Section V.

⁴⁵ See, e.g., Bridgette Carr Report (Carr Report), June 16, 2023, ¶ 37. "There is one indicator which, if present, unequivocally meets the federal definition of sex trafficking: if a minor is involved in a commercial sex act."

Nevertheless, the Plaintiff and the Plaintiff's named experts appear to suggest that this conviction should have been the catalyst for JPMC to take action against Epstein. The Plaintiff and the Plaintiff's named experts do not provide any case law, empirical research, or reliable academic analysis to support this assertion. Instead, they rely upon the unsupported speculation and subjective belief that it would have had an impact on Epstein's ability to continue committing crimes. This is undermined, in part, by the fact that Epstein's alleged crimes continued for another six years after his relationship with JPMC ended in 2013, and after JPMC [REDACTED] [REDACTED] approximately 150 Cash Transaction Reports (CTRs) between 2002 and 2013 on Epstein and Epstein-related accounts.⁴⁶

With that being said, the Plaintiff and the Plaintiff's named experts make a number of general suggestions, without any reliable evidence-base and while ignoring issues related to implementation, as well as conceivable collateral consequences. For example, it appears as though the Plaintiff and the Plaintiff's named experts suggest that JPMC should have intervened differently by taking one of two possible actions:

1. ***End the banking relationship with Epstein earlier.*** Had the information that is now available been provided to JPMC or had law enforcement formally charged Epstein with a sex trafficking offense in 2006, it is more likely than not that the banking relationship would have ended earlier. However, hindsight bias should not impact a determination of liability. Moreover, there is no evidence to suggest that this would have prevented Epstein's crimes or had any impact on his illicit sexual proclivities whatsoever, especially considering the fact that his crimes continued for six years after the banking relationship with JPMC ended.

2.

[REDACTED]
[REDACTED]
according to Defense expert Teresa Pesce, JPMC was consistent with prevailing regulatory expectations and industry standards under the Bank Secrecy Act (BSA). Specifically, in her report, Pesce notes that JPMC had in place policies, procedures, and internal controls to prevent and detect money laundering consistent with industry standards under the BSA. For example, JPMC:

- a. [REDACTED]
- b. Filed approximately 150 Currency Transaction Reports (CTR)s regarding Epstein and Epstein-related accounts from 2002 to 2013;⁴⁸ and
- c. Treated Epstein as a high risk client following his arrest and conviction, per its internal policies, including conducting due diligence on the relationship.⁴⁹

⁴⁶ Teresa A. Pesce Report (Pesce Report), June 23, 2023, ¶ 19-21.

⁴⁷ *Id.*, ¶ 20-21.

⁴⁸ *Id.*, ¶ 19.

⁴⁹ *Id.*, ¶ 100.

Ultimately, although the Plaintiff and the Plaintiff's named experts want this court to believe that cash transactions are a red flag of sex trafficking,⁵⁰ there is no reliable basis for that claim. In fact, payments to women, in cash or otherwise, regardless of the denomination, are actually inconsistent with trafficking. Instead, at the time of the alleged conduct in the present matter, nonpayment of employees was the most reliable indicator of trafficking in persons or modern slavery—an indicator that is not alleged in the present matter. Moreover, and most importantly, Epstein's survivors make clear that many of the women who Epstein paid were not victims, but instead were co-conspirators who allegedly facilitated his crimes—a limitation to the financial data that is wholly overlooked by the Plaintiff and the Plaintiff's named experts.

For example, the Plaintiff and the Plaintiff's named experts completely ignore the fact that Epstein survivors [REDACTED] and [REDACTED] both accuse [REDACTED] a woman who self-identifies as an Epstein victim/survivor, of being a recruiter, enabler, sexual assaulter, and co-conspirator.⁵¹ [REDACTED] has named [REDACTED] as her recruiter,⁵² [REDACTED] has accused [REDACTED] of a traumatic sexual assault,⁵³ and [REDACTED] has publicly accused [REDACTED] and [REDACTED] of being co-conspirators, who are liable for the victimization of others.⁵⁴ As such, there is no reliable or objective method for determining which women paid by Epstein were co-conspirators, victims, neither, or both.

Ultimately, it is important to make note that even in the absence of any legal requirement, JPMC *chose* to end its business relationship with Epstein six years *before* he was indicted for sex trafficking. Hindsight bias appears to have significantly impacted not only the Plaintiff's allegations in this case, but also the Plaintiff's experts' interpretation and application of the facts in evidence.

Based on my review of the evidence and testimony in this case, as well as my research, education, and experience, there were three possible missed opportunities for intervention/preventative action by law enforcement:

1. 1996: [REDACTED] Report
2. 2006: Palm Beach Indictment
3. 2007: Non-Prosecution Agreement⁵⁵ (see Figure 1).

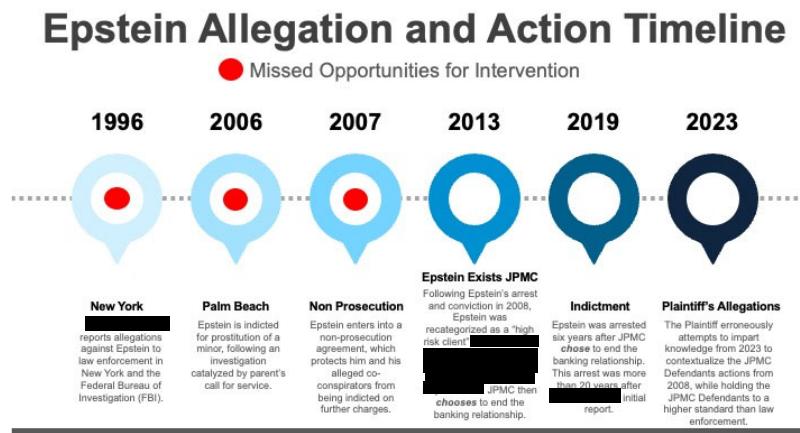


Figure 1. Epstein Allegation and Action Timeline

⁵⁰ See, e.g., Carr Report, ¶ 74.

⁵¹ Tara Palmeri, *The women who enabled Jeffrey Epstein*, Politico, May 14, 2021, <https://www.politico.com/states/new-jersey/story/2021/05/14/the-women-who-enabled-jeffrey-epstein-1382200>.

⁵² [REDACTED] Dep. Tr. 43:10-45:22.

⁵³ JDoe_JPMC_007438-007448.

⁵⁴ In a series of videos posted on her social media accounts. See, for example, <https://youtube.com/shorts/6GVWK4YY4r4>.

⁵⁵ JDoe_DBAG_005165 ("Non-Prosecution Agreement" or "NPA").

[REDACTED]

Given the knowledge that was available during the business relationship between Epstein and JPMC, I have reviewed no evidence to suggest that there was any missed opportunity for intervention that could be reasonably calculated to have prevented Epstein's illicit activity. My opinions and findings in relation to these conclusions are discussed further in the sections below.

V. HUMAN TRAFFICKING OVERVIEW

Opinion

Sex trafficking is a clandestine crime and as a result victims are difficult to identify and are frequently misidentified, even by trained law enforcement, social workers, and healthcare providers. As a consequence of misidentification, sex trafficking victims, including minors, can be denied services and erroneously criminalized. With regards to the present matter, although Jeffrey Epstein was not charged with sex trafficking until 2019, for offenses that allegedly occurred before 2006, various law enforcement officials were made aware of Jeffrey Epstein's predilection for sexual victimization of women and minors as early as 1996, but failed to intervene.

Basis

Human trafficking generally refers to the recruitment, transportation, transfer, harboring, or receipt of persons, by means of threat, force, coercion, abduction, fraud, or deception, for the purpose of exploitation.⁵⁶ This definition encompasses two general forms of human trafficking: labor trafficking and sex trafficking.⁵⁷

Labor trafficking is defined as the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.⁵⁸

Sex trafficking, on the other hand, is defined as when a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age.⁵⁹

While human trafficking is generally understood to refer to “modern slavery,”⁶⁰ the concept of human trafficking did not start becoming internationally popularized until the year 2000.

On October 28, 2000, the U.S. Congress enacted the Trafficking Victims Protection Act (TVPA), which set up actions to combat trafficking in persons through criminal prosecution of perpetrators and direct victim support. Specifically:

1. Coordinate and monitor anti-trafficking activities through an interagency task force;

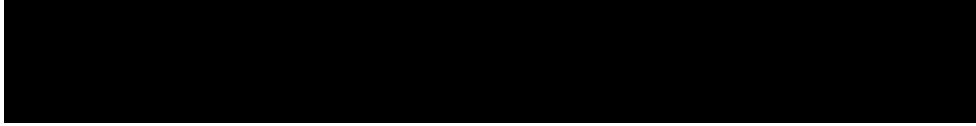
⁵⁶ See, e.g., U.S. Dep’t of Justice, Office of Just. Programs, Nat’l Inst. of Just., *Overview of Human Trafficking and NIJ’s Role*, <https://nij.ojp.gov/topics/articles/overview-human-trafficking-and-nijs-role>.

⁵⁷ *Id.*

⁵⁸ Victims of Trafficking and Violence Protection Act of 2000, Pub. L. No. 106-386, H.R. 3244 (2000).

⁵⁹ *Id.*

⁶⁰ The term “modern slavery” is also used and recognized by the U.S. Supreme Court in regards to human trafficking. See, for example, *Nestle USA, Inc. v. Doe; Cargill, Inc. v. Doe*, https://www.supremecourt.gov/DocketPDF/19/19-416/158424/20201021160124032_40229%20pdf%20Jacques.pdf.

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2. Prevent human trafficking through vocational training, education, and human trafficking public awareness campaigns;
 3. Protect human trafficking survivors by not detaining them in correctional facilities, providing them with medical care and other assistance, and protecting them and their families from revictimization and/or deportation; and
 4. Strengthening prosecution and punishment of human traffickers.⁶¹

Less than two months after the TVPA was adopted in the United States, the United Nations met in Palermo, Italy, and adopted the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime—colloquially known as the Palermo Protocol. In signing the Protocol, signatories made a public commitment to adopt policies that would:

1. Prevent and combat trafficking in persons, paying particular attention to women and children;
2. Protect and assist the victims of such trafficking, with full respect for their human rights; and
3. Promote cooperation among states' parties in order to meet those objectives.⁶²

In December 2008, Congress amended the TVPRA to provide human trafficking survivors with a civil claim against not only criminal perpetrators of trafficking, but, anyone who “knowingly benefits, financially or by receiving anything of value from participation in a venture which that person knew or should have known has engaged in an act” of human trafficking.⁶³

In the years since these developments, there has been a substantial increase in public awareness of human trafficking. There are more anti-trafficking task forces, hotlines, and survivor services than ever before. In addition to federal legislation, more states have also passed legislation to combat trafficking.

However, even today there are still critical gaps between the human trafficking narrative, reality, and policy. Although more people are aware of the human trafficking concept, few understand how this crime manifests in real life, and there is little empirical data to support generalizable information. Typically, victims are coerced, defrauded, and deceived into exploitative situations, where they are manipulated into complacency. Many organizations and anti-trafficking authorities now provide information on how to identify the red flags of human trafficking; however, these “red flags” are not yet empirically tested for sensitivity and specificity, especially in the finance

⁶¹ Victims of Trafficking and Violence Protection Act of 2000, Pub. L. No. 106-386, H.R. 3244 (2000).

⁶² U.N., *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime*, (2000), <https://www.ohchr.org/sites/default/files/ProtocolonTrafficking.pdf>.

⁶³ William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008, Pub. L. No. 110-457, H.R. 7311 (2008).

industry, and even trained law enforcement and service providers frequently misidentify victims (Figure 2 illustrates the burgeoning knowledge on human trafficking, which remains in development).

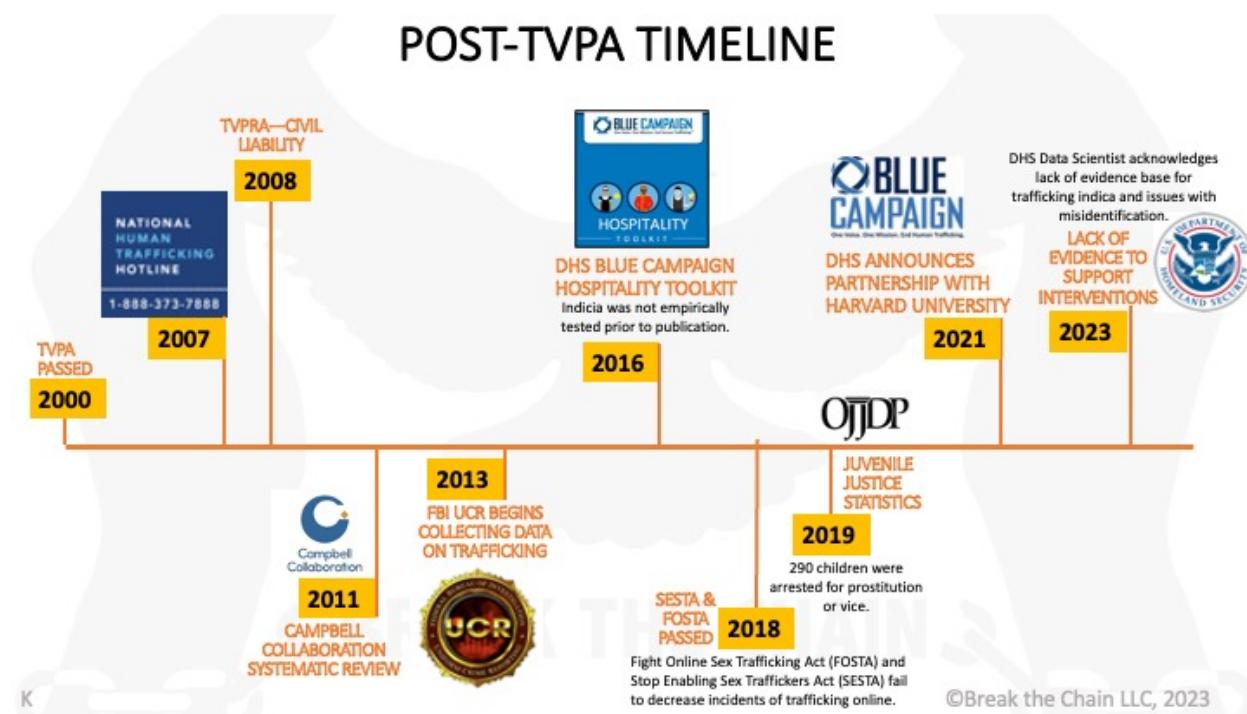


Figure 2. Timeline of Burgeoning Data on Human Trafficking

In fact, the Plaintiff's own proposed expert, Ms. Bridgette Carr, previously acknowledged that in 2013 data collection on human trafficking crimes was in its “infancy.”⁶⁴ In her book, *Human Trafficking Law and Policy*, which was published in 2014, Ms. Carr goes on to write in the chapter dedicated to corporate accountability,

“The framework of legislation, regulations, and other measures needed to engage companies in the eradication of human trafficking within their supply chains — and hold accountable those that do not —is still in the early stages of development.”⁶⁵

⁶⁴ Stacy Teicher Khadaroo, *Human trafficking: As awareness grows, calls triple to national hot line*. Christian Science Monitor (Nov. 22, 2013), <https://www.csmonitor.com/USA/Justice/2013/1122/Human-trafficking-As-awareness-grows-calls-triple-to-national-hot-line>.

⁶⁵Emphasis added. Bridgette Carr, et al. *Human trafficking law and policy* 181 (2014).

To this effect, it is important to recognize that even though, according to the Plaintiff's named expert, the framework of legislation, regulations, and other measures needed to engage companies in the eradication of human trafficking was in the early stages of development in 2014, JPMC *chose* to end their business relationship with Epstein a year earlier (in 2013).

Moreover, while burgeoning research continues to inform and refine so-called "best practices," victims continue to be unwittingly encountered, misidentified, denied services, and even erroneously criminalized. For example, although juveniles, unlike adults, cannot consent to exploitation and therefore *should* be considered victims of trafficking if they were exploited, commercially sexually exploited minors continued to be criminalized in the United States, even twenty years after the passage of the TVPA (see Figure 3).⁶⁶

Of note, there were 110 minors under the age of 18 arrested in 2020, compared to 760 in 2013.⁶⁷ This illustrates the increasing awareness among law enforcement of the fact that minors involved in commercial sex should be treated as people in need of services, regardless of whether they are trafficked, as opposed to being criminalized.

This exponential decline in the number of children arrested for commercial sex was thanks, in part, to the increasing number of states that passed safe harbor legislation, beginning around 2010. State-level safe harbor laws are meant to further decriminalize commercial sexually exploited children. Although practitioners and anti-trafficking organizations make robust claims about the effects of safe harbor legislation,⁶⁸ research suggests that these policies may not be achieving their

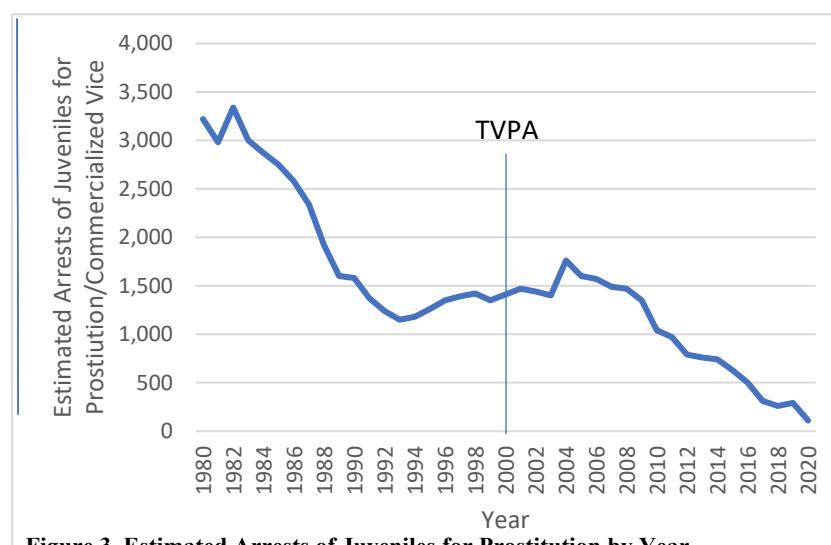


Figure 3. Estimated Arrests of Juveniles for Prostitution by Year

⁶⁶ Data sampled from the OJJDP Statistical Briefing Book. Estimated number of arrests by offense and age group, 1980-2020. Office of Juv. Just. and Delinq. Prevention, Stat. Briefing Book, L. Enf't & Juv. Crime, Jul. 8, 2022, https://www.ojjdp.gov/ojstatbb/crime/ucr.asp?table_in=1.

⁶⁷ *Id.*

⁶⁸ See, e.g., Allison Newcombe, *Child Sex Trafficking: Legal Overview*, A.B.A., Oct. 1, 2015, https://www.americanbar.org/groups/public_interest/child_law/resources/child_law_practiceonline/child_law_practice/vol-34/october-2015/child-sex-trafficking--legal-overview/; and *Human Trafficking Issue Brief: Safe Harbor*, Polaris Project (2015), <https://polarisproject.org/wp-content/uploads/2019/09/2015-Safe-Harbor-Issue-Brief.pdf>.

intended effect in practice; commercial sexually exploited juveniles continue to be criminalized post safe harbor implementation.⁶⁹ In fact, the first state to pass safe harbor protections for commercial sexually exploited children (New York) experienced an increase in juvenile prostitution arrests post-safe harbor implementation (see Figure 4). By 2013, 18 states had passed safe harbor laws.⁷⁰

Misidentification by Law Enforcement

Given the lack of empirical evidence on human trafficking indicia and identification strategies, the likelihood of U.S. law enforcement officials actually identifying a victim has historically been relatively low, and is even lower when it comes to private businesses.

For example, using a nationally representative survey of police organizations, Farrell, McDevitt, & Fahy (2010) found that between 2000 and 2006, less than 10% of police agencies identified a human trafficking case. Even with increases in awareness and new, more comprehensive legislation at the disposal of law enforcement, few human trafficking cases are ever identified (Farrell, Owens, & McDevitt, 2013).

In evaluating why many law enforcement agencies have identified relatively few cases, Farrell (2013) analyzed data from municipal police agencies in the United States. Her research found that despite changes in legislation, police agencies might still be unprepared to identify and respond to human trafficking locally. In part, the study found that due to theoretical and practical barriers with effectuating organizational change within police agencies, policy developments have not necessarily manifested into changes in practice.

As of 2014, The Polaris Project reported that only 32 states mandate or encourage training of law enforcement on human-trafficking crimes.⁷¹ Even when the police had received basic training about human trafficking, they generally were unable to identify a broad range of human



Figure 4. Estimated Arrests of Juveniles for Prostitution in New York by Year, Before and After the Safe Harbor Law

⁶⁹ See, e.g., Kimberly Mehlman-Orozco, *Safe Harbor legislation for juvenile victims of sex trafficking: A myopic view of improvements in practice*. 3 Social Inclusion, 52-62 (2015).

⁷⁰ Mehlman-Orozco, K. B., *Safe Harbor legislation for juvenile victims of sex trafficking: A myopic view of improvements in practice*, Social Inclusion, Open Access Journal, 3.1: 52-62 (2015).

⁷¹ 2014 State Ratings on Human Trafficking Laws (2015), Polaris Project, <https://polarisproject.org/wp-content/uploads/2019/09/2014-State-Ratings.pdf>.

[REDACTED]

trafficking.⁷² Law-enforcement officials often struggle to distinguish human-trafficking crimes from other previously existing crimes such as prostitution. As a result, law enforcement commonly misclassifies human-trafficking victims as offenders.⁷³

To retroactively correct the erroneous criminalization faced by human trafficking victims in the criminal justice system, an increasing number of states have passed vacatur statutes.⁷⁴ These laws provide post-conviction relief for survivors of human trafficking by completely erasing criminal convictions related to their victimization. By one count, 18 states had passed vacatur statutes and another 10 states had enacted partial vacatur laws by 2017.⁷⁵

Ultimately, misidentifications of trafficking crimes and other sexually based offenses by law enforcement were even more prevalent during the alleged victimization period in this case. To this effect, it is no surprise that Epstein survivor [REDACTED] has been very vocal in criticizing law enforcement's "minimal action," despite receiving reports in 1996, 2006, 2008, and 2011.⁷⁶ According to [REDACTED] attorney, Jennifer Freeman, had law enforcement intervened, the subsequent sexual victimizations "could have been avoided."⁷⁷

Although there is a reasonable expectation for law enforcement to respond to overt reports of sexual victimization, that apparently did not occur in the present matter. And while there was no such overt disclosure made by any victim to any employee of JPMC, it appears as though the Plaintiff and the Plaintiff's named experts are attempting to hold private businesses such as banks to a higher standard. Still, even though "best practice" indicators for trafficking were not yet available to the financial services industry and there was no legal requirement to do so, JPMC **chose** to end their banking relationship with Epstein six years before he was indicted for sex trafficking. This is particularly impressive, considering at that same time "local police were

⁷² Farrell, A. & Pfeffer., R., *Policing Human Trafficking: Cultural Blinders and Organizational Barriers*, The ANNALS of the American Academy of Political and Social Science (2014); Gallagher, A. & Holmes, P., *Developing an Effective Criminal Justice Response to Human Trafficking: Lessons from the Front Line*, International Criminal Justice Review (2008), retrieved from:

<http://togetherletsstoptraffick.org/assets/OnlineDocuments/ICJR-GALLAGHER-HOLMES.pdf>; Wilson, J.M. & Dalton, E., *Human Trafficking in the Heartland: Variation in Law Enforcement Awareness and Response*, Journal of Contemporary Criminal Justice, pp. 296-313 (2008).

⁷³ Farrell, A., Owens, C., & McDevitt, J., *New laws but few cases: understanding the challenges to the investigation and prosecution of human trafficking cases*, Crime, Law and Social Change, 661, 139-168 (2013); Farrell, A., Pfeffer, R., & Bright, K., *Police perceptions of human trafficking*, Journal of Crime and Justice, 38(3): 1-19 (2015).

⁷⁴ Mehlman-Orozco, K. B. & Hedlin, S., *Mehlman-Orozco, Hedlin: Stop criminalizing victims of sex trafficking*, The Houston Chronicle (Jan. 19, 2017), retrieved from:

<https://www.houstonchronicle.com/opinion/outlook/article/Mehlman-Orozco-Hedlin-Stop-criminalizing-10869881.php>.

⁷⁵ Rabjan, J., *State Advocacy, Fact Sheet: Vacatur Laws*, National Council of Jewish Woman, retrieved from: https://www.ncjw.org/wp-content/uploads/2017/07/Fact-Sheet_Vacatur-Laws_Updated-2016.pdf.

⁷⁶ Briquet, Kate, *Epstein Victim Demands FBI Investigate Its Failure to Stop Him*, Daily Beast (May 2, 2023), retrieved from: [https://www.thedailybeast.com/epstein-victim-\[REDACTED\]-demands-fbi-investigate-its-failure-to-stop-him](https://www.thedailybeast.com/epstein-victim-[REDACTED]-demands-fbi-investigate-its-failure-to-stop-him).

⁷⁷ *Id.*



confused about what human trafficking is.”⁷⁸ This confusion, coupled with cultural blinders and organizational barriers has further inhibited law enforcement’s ability to identify possible trafficking situations and effectively/rapidly intervene. Nevertheless, even in the absence of evidence based indicia, JPMC elected to exit Epstein in 2013.

Misidentification by Healthcare Providers

Similar to law enforcement officers, the likelihood of medical and mental health providers successfully identifying a victim is also very low. Training on human trafficking for these professionals is correspondingly not evidence-based or universally mandated. For example, in *Psychiatry’s Role in the Management of Human Trafficking Victims: An Integrated Care Approach*, which was published in 2018, the authors wrote that “*Victims are often underrecognized and there are few guidelines for how best to identify, care for, and safely reintegrate victims back into the community.*”⁷⁹ Additionally, the authors found that there were no integrated care models that provide decisional guidelines at different points of intervention for human trafficking patients. In another article, *What are the Human Trafficking Policies of Professional Medical Organizations?*, which was published in 2021, the authors wrote that “*human trafficking is an international public health concern in which healthcare professionals are in a unique position to intervene. It is unclear how professional medical organizations have responded to the need to identify and assist trafficked patients.*”⁸⁰ Even in 2021, only eight out of 265 national medical organizations had policies regarding human trafficking and “*although human trafficking is recognized as a public health issue, research on the health effects of human trafficking and best intervention practices is limited.*”⁸¹

Failed opportunities for identification by medical professionals are a common experience by most victims of trafficking, especially considering that it is estimated that 88% of trafficking victims reported seeing an accredited healthcare professional during the time that they were trafficked.⁸²

While the “red flags” of trafficking that can be screened for in medical fields are not empirically supported by rigorous and reliable research, they are beginning to be referred to as “best practices” and are being included in trainings and published guidance. For example, “best practice” indicia may include pelvic trauma, neglected care, and even “tattoos indicating ownership or sex work;” which include “names,” “dollar signs,” “references to money,” and “tattoos on the neck or pelvis,”

⁷⁸ Farrell A. & Pfeffer R., *Policing Human Trafficking: Cultural Blinders and Organizational Barriers*, The Annals of the American Academy of Political and Social Science 60, 653:46, (2014) Retrieved from: <https://ann.sagepub.com/content/653/1/46>.

⁷⁹ Gordon, Mollie, et al., *Psychiatry’s Role in the Management of Human Trafficking Victims: An Integrated Care Approach*, Journal of Psychiatric Practice, 24.2, p. 79-86 (2018).

⁸⁰ Fang, S., et al., *What are the Human Trafficking Policies of Professional Medical Organizations?*, Journal of Human Trafficking (2021), retrieved from: <https://www.tandfonline.com/doi/abs/10.1080/23322705.2019.1698895>.

⁸¹ Jain, J., et al., *Creating a collaborative trauma-informed interdisciplinary citywide victim services model focused on health care for survivors of human trafficking*, Public Health Reports 137.1_suppl: 30S-37S (2022).

⁸² Gordon, Mollie, *Human Trafficking: In Plain Sight – Health Care Response to Trafficking: Recognize, Respond & Refer*, retrieved from: <https://www.youtube.com/watch?v=nJxtfN9siLY>.

[REDACTED]

among others.⁸³ It should be noted that none of Epstein's purported⁸⁴ victims exhibited these indicia and those who were seen by medical health providers, such as [REDACTED]⁸⁵, [REDACTED],⁸⁶ and [REDACTED]⁸⁷, were apparently not identified as victims during those interactions.

Ultimately, the medical and mental health communities have not yet adopted and/or generally accepted any particular indicia for identifying victims of trafficking. At present, I am not aware of any medical "red flags" that were detected by any third party during the alleged victimization period in this case, nor would a "red flag" for the medical or mental health setting be appropriate to assess in a business setting. Moreover, like most service providers, private businesses, and members of the public, health care providers often have misconceptions and stereotypes about what trafficking looks like and these pre-judgements can impede identification.

⁸³ Fang, S., et al., *Tattoo recognition in screening for victims of human trafficking*, The Journal of Nervous and Mental Disease, 206.10: 824-827 (2018). Note: none of these are sufficiently alleged in the present complaint.

⁸⁴ Note: The word purported is used here because, while Epstein clearly victimized some unknown number of women and girls, some of Epstein's known victims are alleging that co-conspirators are secondarily exploiting the current situation and are erroneously self-identifying as victims, even though they facilitated his crimes. It would do a disservice to true victims to group actual survivors of Epstein's sexual assaults with those who are alleged to have facilitated his crimes. Specifically, for example, [REDACTED] are alleged by various sources to have been co-conspirators, not victims, and [REDACTED] accuses [REDACTED] of being a co-conspirator.

⁸⁵ ESTATE_JPM018244 (ledger reflecting medical treatment for [REDACTED])

⁸⁶ ESTATE_JPM005201 (Apr. 14, 2009 email regarding medical treatment for [REDACTED]);
ESTATE_JPM017420 (Apr. 29, 2010 email regarding medical treatment for [REDACTED]).

⁸⁷ ESTATE_JPM005238 (email from [REDACTED] to Epstein regarding medical treatment).

VI. MISIDENTIFICATIONS AS SENTINEL EVENTS

Opinion

Missed opportunities for intervention and misidentification can be considered sentinel events and research on sentinel events is antithetical to the approach by Plaintiff's named experts in the present matter. Hindsight bias should not be used implicate blame or impart culpability, but instead to identify root causes and inform solutions.

Basis

As discussed in *Supra* Section IV, human trafficking is a clandestine crime, which is difficult to identify, even for trained law enforcement. Moreover, there is little research available to support any particular indicia or intervention. Even less information was available at the time of the alleged victimization period in this case regarding the “best practices” of human trafficking identification and interventions for businesses. As a result, unwitting encounters of trafficking crimes are best conceptualized as sentinel events.

“Sentinel events” can be generally defined as occurrences that signal the need for immediate investigation and response.⁸⁸ These occurrences are unexpected, adverse, and typically blamed on operator errors. An operator error can be defined as a mistake made by the human user of a complex system. An operator error proliferated through an organization or across agencies can manifest into a sentinel event. However, the effects of normal operator errors can be potentially contained with appropriate institutional safeguards; thus reducing the risk of mistake proliferation into a full-blown sentinel event. Originating from the medical field, sentinel event reviews provide the opportunity to analyze the root causes of these errors and identify mechanisms for reducing future risk.

Charles Perrow’s Normal Accident Theory is used to conceptualize organizational structures that contribute to the proliferation of sentinel events in certain organizations.⁸⁹ With the criminal justice backdrop,⁹⁰ human trafficking victims are identified as an underserved victim population, whom are adversely affected by a number of sentinel events, including misidentification and erroneous criminalization. Missed opportunities for intervention can also be viewed as “sentinel events.”

With 20/20 hindsight, observers and/or administrators are inclined to point out what an actor should have done differently.⁹¹ In fact, according to Charles Perrow (1999) 60-80 percent of accidents are attributed to “operator error.” However, this blame placing fails to recognize the underlying issues that may contribute to the process of a normal mistake manifesting into a

⁸⁸ For example, see New York State. Sentinel Events. Office of Mental Health. Available here: https://omh.ny.gov/omhweb/dqm/bqi/sentinel_events.html

⁸⁹ Perrow, C. (1999). *Normal accidents: Living with high risk technologies*. Princeton University Press.

⁹⁰ See, for example, Doyle, J. M. (2010). Learning from error in American criminal justice. *J. Crim. L. & Criminology*, 100, 109.

⁹¹ Perrow, C. (1999). *Normal accidents: Living with high risk technologies*. Princeton University Press.

sentinel event. While an operator error may be erroneously accused of being the proximate “cause” of an accident,⁹² these errors may not be the root cause. In response to sentinel events, operators often become the scapegoats, even though their actions were not the root cause.

Certain types of organizational systems are more prone than others to sentinel events. According to Charles Perrow (1999) organizations with complex, tightly coupled, and interdependent systems are more likely to have normal accidents proliferated throughout the organization, which in turn may result in more frequent sentinel events.⁹³ The criminal justice system is one example of a group of organizations with complex, interdependent, and tightly coupled relationships. For example, in the criminal justice system, a mistake made by a police officer, if left unchecked, can affect the decision by a magistrate, prosecutor, jury, judge, correctional officer, and service provider. Police officers may be viewed by some as infallible, which may also contribute to the proliferation of the mistake, due to bounded rationality of other organizational actors. These types of problematic interactions are similar across disciplines. In studying the underlying processes associated with behavior, ethnographers recognize that people:

- (1) Assume things are as they appear unless they have a reason to believe otherwise;
- (2) Will be bounded by their rationality, or information they have at their disposal at the time; and
- (3) Will assume that others see things as they do.

A bank can also be described as an organization with complex, interdependent, and tightly coupled organizational structures, which can make this type of business at risk of sentinel events. In response to this risk, JPMC had a multi-layered defense model to protect the organization against active and passive threats.⁹⁴ Like any other similarly situated organization, JPMC attempted to mitigate risk through multi-layered safety and security protocols. However, given the clandestine nature of trafficking crimes, even the “best practice” barriers are recognized as being imperfect. While risks can be mitigated by using differing layers and types of defenses, also known as the “Cumulative Act Effect” or the “Swiss Cheese Effect,” these risks cannot be eliminated entirely (see Figure 5⁹⁵).

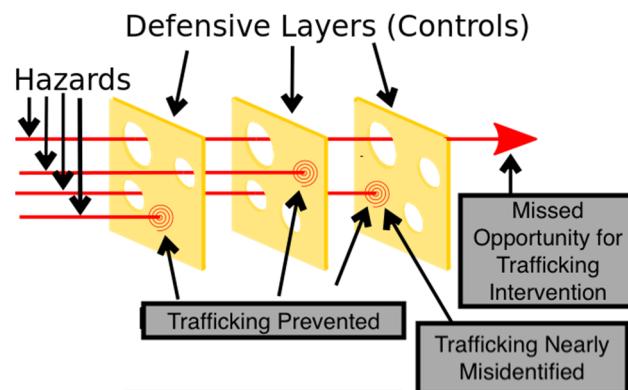


Figure 5. “Swiss Cheese Effect” Regarding Trafficking Intervention

⁹² Doyle, J. M. (2010). *Learning from error in American criminal justice*. *J. Crim. L. & Criminology*, 100, 109.

⁹³ Marais, K., Dulac, N., & Leveson, N. (2004, March). *Beyond normal accidents and high reliability organizations: The need for an alternative approach to safety in complex systems*. In Engineering Systems Division Symposium (pp. 1-16). MIT Cambridge, MA.

⁹⁴ Pesce Report, ¶4, 24-25.

⁹⁵ Adapted from CC BY-SA 4.0

[REDACTED]

Ultimately, JPMC *chose* to end their banking relationship with Epstein in 2013 without any statutory requirement or best practice recommendation, which was six years before Epstein was indicted for a trafficking offense. Given the information that has been released since then, this sentinel event will more likely than not inform JPMC interventions moving forward, which is consistent with sentinel event research and best practices on anti-trafficking efforts.

VII. INDICIA AND ANTI-TRAFFICKING INTERVENTIONS FOR BUSINESSES

Opinion

Based on my education, training, experience, and research, indicia of sex trafficking are still in the process of being developed and tested for sensitivity and specificity and there is no reliable formula or common, generalizable indicia of trafficking available to private businesses.

Basis

Allegations are not actionable and, if not properly investigated and validated by a trier of fact in a court of law, can result in misidentification and legal consequences.

For example, take the cases of Charlie Chaplin, Jack Johnson, and Eleanor Williams. Charlie Chaplin was accused—and later acquitted—of trafficking after paying his mistress's train fare to New York, following an investigation intended to generate negative publicity about him over his suspected political leanings.⁹⁶ Jack Johnson was convicted—and posthumously pardoned⁹⁷—of trafficking following racially motivated prosecutions under the Mann Act.⁹⁸ More recently, Eleanor Williams' false allegations that she was raped and trafficked across the United Kingdom by an Asian gang led to the arrest of multiple men who later said their lives had been ruined.⁹⁹

Given the lack of reliable formula or common, generalizable indicia of trafficking for private businesses, these are just some examples of the dangers associated with interventions catalyzed by allegations alone, especially against celebrities or persons with a public profile.¹⁰⁰

At the time of the alleged victimization period in this case, there were no evidence-based interventions to reliably identify sex trafficking. This applies not only to the financial services industry, but as discussed previously to law enforcement and direct service providers, such as medical and mental health care providers as well.

⁹⁶ Weiner, Eric, *The Long, Colorful History of the Mann Act*, NR, (March 11, 2008), retrieved from: <https://www.npr.org/2008/03/11/88104308/the-long-colorful-history-of-the-mann-act>.

⁹⁷ Eligon, John and Michael D. Shear, *Trump Pardons Jack Johnson, Heavyweight Boxing Champion*, *The New York Times* (May 24, 2018), retrieved from: <https://www.nytimes.com/2018/05/24/sports/jack-johnson-pardon-trump.html>.

⁹⁸ *Id.*

⁹⁹ McCann, Phil, *Eleanor Williams: The grooming gang lies that sparked outrage*, BBC (Jan. 3, 2023), retrieved from: <https://www.bbc.com/news/uk-england-cumbria-64150026>.

¹⁰⁰ It should also be noted that related to the present matter Epstein survivor [REDACTED] publicly accused attorney Brad Edwards of actions consistent with secondary exploitation and accused his partner, Stan Pottinger, of sexual harassment. This also underscores the need to validate allegations before taking action. See, e.g., [https://www.tiktok.com/@\[REDACTED\]](https://www.tiktok.com/@[REDACTED]) [https://www.tiktok.com/@\[REDACTED\]](https://www.tiktok.com/@[REDACTED]).

Within the field of criminology, it is generally accepted that randomized controlled trials (experiments) are considered the gold-standard—the highest quality research—for evaluating the effectiveness of an intervention. In order to promote more evidence-based interventions to effectively combat crime, criminologists have taken a distinct “experimental turn” and the sheer number of quantitative experiments in criminology has increased dramatically in recent decades.¹⁰¹ Most evidence-based criminological interventions have dozens of experiments supporting their efficacy. For example, Braga, Welsh, and Schnell (2015) conducted a meta-analysis of 30 randomized experimental and quasi-experimental tests of disorder policing.¹⁰² However, there is remarkably less research evaluating the efficacy of human trafficking interventions, including trainings.

In an assessment of extant research, Van der Laan et. al. (2011) conducted a systematic review of evaluations for interventions aimed to prevent and suppress trafficking in human beings in conjunction with the Campbell Collaboration.¹⁰³ The search identified 144 studies, but there was no methodologically rigorous evaluation of interventions aimed to prevent and suppress trafficking in human beings.¹⁰⁴ Therefore, the researchers could not draw any conclusions on actual outcomes or impacts of these interventions.¹⁰⁵

In order to be considered “high quality,” a study would at least need to have a level 3 on the Maryland Scientific Methods Scale (SMS) (see Table 1).

Table 1. Maryland Scientific Methods Scale (SMS)¹⁰⁶

Level	Study Design
1	Correlation between a prevention program and a measure of crime at one point in time.
2	Measures of crime before and after the program, with no comparable control condition.
3	Measures of crime before and after the program in experimental and comparable control conditions.
4	Measures of crime before and after the program in multiple experimental and control units, controlling for other variables that influence crime.
5	Random assignment of program and control conditions to units.

¹⁰¹ Sampson, R.J., *Gold Standard Myths: Observations on the Experimental Turn in Quantitative Criminology*, J. Quantitative Criminology, 26, 489–500 (2010), retrieved from: <https://doi.org/10.1007/s10940-010-9117-3>.

¹⁰² Braga, A. A., Welsh, B. C., et al., *Can Policing Disorder Reduce Crime? A Systematic Review and Meta-analysis*, Journal of Research in Crime and Delinquency, 52(4), 567–588 (2015), retrieved from: <https://doi.org/10.1177/0022427815576576>.

¹⁰³ Campbell Collaboration is a social science research network that produces high quality, open access evidence synthesis in the field of criminology.

¹⁰⁴ No study was at least level 3 of the Maryland Scientific Methods Scale (SMS), i.e., a controlled design with both pretest and posttest measures and comparable control conditions.

¹⁰⁵ Van der Laan, P. H., Smit, M., et al., *Cross-border Trafficking in Human Beings: Prevention and Intervention Strategies for Reducing Sexual Exploitation*, Campbell Systematic Reviews (2011).

¹⁰⁶ Farrington, D. P., Gottfredson, D. C., et al., *The Maryland Scientific Methods Scale*. In *Evidence-Based Crime Prevention*, pp. 27-35, Routledge (2003).

However, at present, I am not aware of even a single published Level 1 study evaluating the efficacy of the human trafficking victim identification protocols and/or “red flags” espoused by the Plaintiff’s named experts. *In fact, none of the Plaintiff’s named experts can cite any rigorous research to support the contention that there was even a single evidence-based red flag overlooked by JPMC.* This is because, even in 2023, researchers acknowledge that the accuracy of trafficking indicators, such as The Blue Campaign, have not been tested for accuracy or reliability and their use is based on nothing more than an assumption that the content included appropriately depicts trafficking crimes¹⁰⁷—an assumption that is not even supported by anecdote.

At present, instead of relying on state of the science research methods, businesses, service providers, and other practitioners are limited to implementing speculative “best practices” with relatively unknown efficacy. At the same time, a growing number of qualitative and anecdotal data suggests that there are significant issues with misidentification, as discussed further below.

Affected Industries

In 2018, the anti-trafficking non-profit Polaris Project released a report entitled *On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking*, which included a section on recommendations for *Financial Institutions*.¹⁰⁸ The survey included only 127 respondents and was not regulated by any institutional review board (IRB) process, which is standard practice for empirical research involving human subjects. While a nationwide sample of 127 respondents is too small to draw any generalizable inferences and the methodology was limited,¹⁰⁹ resulting in empirically unreliable data, some purported experts rely upon the findings of this study when discussing industries affected by sex trafficking.

The report identified eight industries that encounter human trafficking crimes:

¹⁰⁷ Savoia, E., et al. *A Quasi-Experimental Intervention Trial to Test the Efficacy of a Human Trafficking Awareness Campaign: The Blue Campaign*, Journal of Human Trafficking (2023): 1-20.

¹⁰⁸ Polaris Project, *On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking* (July 2018), retrieved from: <https://polarisproject.org/wp-content/uploads/2018/08/A-Roadmap-for-Systems-and-Industries-to-Prevent-and-Disrupt-Human-Trafficking.pdf>.

¹⁰⁹ For example, the survey was completed online and respondents were not asked for any kind of confirmation of victim status. Respondents were not selected randomly and were compensated for their participation. Results did not account for social desirability bias, nonresponse bias, or sampling bias.

1. Financial Services;
2. Housing and Homelessness Systems;
3. Social Media;
4. Temporary Work Visas;
5. Transportation;
6. Business Regulatory Systems;
7. Healthcare; and
8. Hotels and Motels.

Of those different industries, Financial Services Industry encountered the most diverse forms of trafficking (see Figure 6).

However, the reality is that human trafficking is a clandestine crime. Traffickers go to great lengths to conceal their activities from third parties. Therefore, even though a variety of industries may encounter trafficking victims on their platforms or premises, more often than not these encounters are obscured.

Even in industries where businesses and service providers physically encounter victims of sex trafficking, misidentification is prevalent. Law enforcement, medical and mental health professionals, transportation staff, hoteliers, and beauty professionals are all at risk of unwittingly encountering victims of human trafficking; however, there are no reliable, evidence-based indicators available to any of these industries.

Human Trafficking “Indicators” in Aviation

For example, the FAA Extension, Safety, and Security Act of 2016, requires air carriers to provide initial and annual flight attendant training regarding recognizing and responding to potential human trafficking victims. The Blue Lightning Initiative (BLI), led by the Department of Transportation, the Department of Homeland Security, and U.S. Customs and Border Protection, is an element of the DHS Blue Campaign. The BLI trains aviation industry personnel to identify

	\$ Financial Services Industry	Hotels & Motels	Housing & Homelessness Systems	Social Media	Temporary Work Visas	Airplane Transport- ation	Business Regulatory Systems	Health Care
Escort Services	●	●	●	●		●		●
Illicit Massage Businesses	●		●	●	●	●	●	
Outdoor Solicitation		●	●	●		●		●
Residential Sex Trafficking	●		●			●		●
Domestic Work	●		●	●	●	●		●
Bars, Strip Clubs, & Cantinas	●	●	●	●		●	●	●
Pornography	●			●		●	●	●
Traveling Sales Crews	●	●	●	●		●	●	●
Restaurants & Food Service	●		●	●	●	●	●	●
Peddling & Begging			●					
Agriculture & Animal Husbandry	●			●	●	●	●	●
Personal Sexual Servitude			●	●				●
Health & Beauty Services	●		●		●	●	●	●
Construction	●		●		●		●	●
Hospitality	●	●			●		●	●
Landscaping	●				●	●	●	●
Illicit Activities	●		●			●		●
Arts, Sports & Entertainment	●			●	●	●	●	●
Commercial Cleaning Services	●	●	●		●		●	
Factories & Manufacturing	●		●		●		●	●
Remote Interactive Sexual Acts	●		●	●				
Carnivals	●				●	●	●	●
Forestry & Logging	●				●	●	●	●
Health Care	●		●		●		●	●
Recreational Facilities	●	●			●		●	

Figure 6. Polaris Project Matrix on Human Trafficking Types by Industry

[REDACTED]

potential traffickers and human trafficking victims, and to report their suspicions to federal law enforcement.

The BLI training was developed based on feedback from aviation industry “experts” and human trafficking survivors. The training is 25 minutes in length, and is comprised of four lessons that include:

1. What is Human Trafficking?;
2. Indicators of Human Trafficking Activity;
3. Reporting Suspected Human Trafficking; and
4. Indicator Challenge.¹¹⁰

One of the supposed “indicators” or “red flags” that airlines were trained on was “a non-genuine relationship; particularly parent/guardian-child” (see Figure 7).¹¹¹ However, there was absolutely no empirical evidence to support this “indicator” or “red flag” as being a valid sign of trafficking and anecdotal evidence suggests that it may have remarkably low rates of specificity.

According to multiple airline patrons, employees began falsely accusing and/or initiating investigations for trafficking against predominately mixed-race passengers, even though they were law abiding (for examples, see Table 2).



Figure 7. Blue Lightning Initiative for Aviation Personnel "Indicators"

Table 2. Examples of Human Trafficking “Red Flag” Indicia Resulting in False Allegations and Claims of Racial Profiling

Case Name/Number	Year	Allegations
PETER DELVECCHIA, et al., Plaintiffs, v. FRONTIER AIRLINES, Inc., et al., Defendants. Case No. 2:19-cv-01322-KJD-NJK	2019	Plaintiff Peter DelVecchia (“Peter”) and his twelve-year old son, Plaintiff A.D., contracted with Defendant Frontier Airlines to fly from North Carolina to Las Vegas. Plaintiff Peter is Caucasian and his son, A.D. is African-American. Defendant Warren then falsely accused Peter of engaging in illegal human trafficking and sexual assault. Based upon the allegations of the complaint, the assault and the accusations were based on Warren’s belief that an older white man should not be traveling with a younger black child. Warren had discussed these beliefs with the rest of the flight crew, the other defendants. They concurred in his belief that the situation was “improper” and that Peter showed inappropriate affection to

¹¹⁰ U.S. Dep’t of Transportation, *Blue Lightning Initiative*, retrieved from: <https://www.transportation.gov/administrations/office-policy/blue-lightning-initiative>.

¹¹¹ Blue Lightning Initiative, *A Guide for Aviation Personnel to Recognize and Report Suspected Human Trafficking*, retrieved from: <http://hiddeninplanesight.org/wp-content/uploads/afa-cobranded-blue-lightning-pocket-guide-5.pdf>.



Case Name/Number	Year	Allegations
		A.D. Warren then forced A.D. to leave his seat and father. He was forced to sit in the rear of the plane where an adult male sat between A.D. and the aisle. The father and the son were not allowed to reunite for the duration of the flight. ¹¹²
N/A	2021	Mary MacCarthy of Los Angeles and her 10-year-old daughter, Moira, were flying to Denver. When they arrived in Denver, MacCarthy said, she and her daughter were met on the jetway by two Denver police officers. The mother and daughter were cleared, but police report noted that officers were responding to a “possible Human Trafficking reported by Southwest flight attendant,” which Ms. MacCarthy believed was racial profiling. ¹¹³
N/A	2021	Lakeyanay Bailey, a 21-year-old Black woman, was traveling from Denver to Dallas with her 4-year-old adoptive sister, Olivia, who is white. When the pair landed at Dallas Fort Worth International Airport, authorities were waiting for them inside the gate. The incident report said that Frontier Airlines requested police to investigate the matter after a passenger on the plane was concerned about a possible human trafficking incident involving a female born in 2001 who was traveling with a female born in 2017. ¹¹⁴
N/A	2015	Kathleen Chan and Jay Serrano are residents of Astoria, Queens, who were returning from a holiday trip to the Dominican Republic. When their American Airlines flight landed at JFK Airport, the flight captain asked everyone to stay seated. After about 20 minutes, three-armed Port Authority police officers entered the plane and asked Chan to escort them outside. Chan, an Asian woman, and Serrano, a Puerto Rican man, were told that the flight crew had alerted the police that it was a possible case of sex trafficking, ¹¹⁵ even though the couple were in a consenting adult relationship and actually lived together.
N/A	2017	Brian Smith, from Arizona, was travelling back from a trip to Florida with his wife Renee and their three children, including Georgianna, 16, who the couple adopted from China. Mr. Smith said as the family got off their Southwest Airlines flight in Phoenix, he was approached by police who said a flight attendant had “some concerns about the person you’re with.” Southwest Airlines later released a statement: “Our flight attendants do receive training in recognizing expert-identified, common behavioral indicators of human trafficking. Following conversations with authorities on the ground after the flight, we’re continuing our conversation with the family and with our employees whose valuable vigilance is aimed at aiding law enforcement in successfully stopping a growing number of trafficking situations.” ¹¹⁶

¹¹² See case information, retrieved from: <https://casetext.com/case/delvecchia-v-frontier-airlines-1>.

¹¹³ Jenn, S. & Lemos, G., *Mom says Southwest Airlines thought she was trafficking her biracial daughter*, CNN (Nov. 8, 2021), retrieved from: <https://www.cnn.com/2021/11/07/us/southwest-airlines-human-trafficking-accusation/index.html>.

¹¹⁴ Wang, B., *Black Aurora woman questioned for trafficking white sister at Dallas airport*, Denver7 (July 21, 2021), retrieved from: <https://www.thedenverchannel.com/news/local-news/black-aurora-woman-questioned-for-trafficking-white-sister-at-dallas-airport>.

¹¹⁵ Nolan Brown, E., *Another Asian Air Traveler Detained Over Suspicions She’s Being Sex Trafficked*, Reason (Jan. 14, 2016), retrieved from: <https://reason.com/2016/01/14/another-asian-woman-detained-at-airport/>.

¹¹⁶ News.com.au, *Man wrongly accused of human trafficking teenage daughter*, (Dec. 22, 2017), retrieved from: <https://www.news.com.au/travel/travel-updates/incidents/man-wrongly-accused-of-human-trafficking-teenage-daughter/news-story/0b541932de32ad24c66894fd86bc7ce4>.

Case Name/Number	Year	Allegations
N/A	2017	Osvaldo Maciel had been flying back to New York from a trip to Cancun to visit family with his fairer skinned young daughter on March 1, when another passenger accused him of child trafficking. When the plane touched down at Newark Airport, Mr. Maciel and his daughter were allegedly approached by a number of officers from the Port Authority and Customs and Border Patrol, escorted off the plane and interrogated. Mr. Maciel's wife stated the incident was based on nothing more than a racially charged observation. ¹¹⁷

Additionally, persons erroneously accused of trafficking and/or reported to the police as victims have started to file lawsuits alleging defamation. For example, Marcia Festen and E.L. recently filed a lawsuit against Eastside Medical Center LLC, Robin Lowman White, Elizabeth Davlantes, and Jane Marilyn Pineda on July 3, 2022 (Case No. 1:22-cv-02646-MHC) in the United States District Court Northern District of Georgia Atlanta Division asserting claims of defamation, slander and libel because E.L. was erroneously reported to the police as a suspected victim of trafficking.

Ultimately, although anti-trafficking training and interventions may be well-intentioned, they are largely untested or unsupported by rigorous empirical research. Extant information suggests that many “indicia” have low rates of specificity and misidentification, as well as missed opportunities for intervention, persist.

Human Trafficking “Indicators” in Hospitality

Similar to the guidance for the financial services industry and the aviation industry, the Department of Homeland Security Blue Campaign toolkit for identifying human trafficking in the hospitality industry is not considered evidence based either.

The Blue Campaign published a hospitality toolkit in 2016 that featured four sets of “indicators,” which were developed without any empirical testing or validation,¹¹⁸ for different types of staff:

1. Hotel and Motel Staff;
2. Housekeeping, Maintenance, and Room Service Staff;
3. Concierge, Bellman, Front Desk, Security, and Valet Staff; and
4. Food and Beverage Staff.

This toolkit includes a number of “general indicators,” which lack any empirical support, for examples, see Table 3.

¹¹⁷ News.com.au, *Father interrogated for child trafficking because his daughter did not look like him*, (Apr. 21, 2017), retrieved from: <https://www.news.com.au/travel/travel-updates/incidents/father-interrogated-for-child-trafficking-because-his-daughter-did-not-look-like-him/news-story/dad68db2c0d0a3425a80b04c545fa245>.

¹¹⁸ I personally interviewed Mick McKeown, who was Executive Director of the Homeland Security Advisory Council and Campaign Office during the time this toolkit was created, and he confirmed absolutely no research was used in the development of these indicators or to test their sensitivity or specificity for identifying potential trafficking on premises.

Table 3. Sample of Blue Campaign "Indicia" and Countervailing Information

Applicable Staff	Blue Campaign "General Indicator"	Countervailing Information
All hotel and motel staff	Individuals have few or no personal items—such as no luggage or other bags.	There is no empirical evidence to support this purported "indicium." Publicly criticized for potentially ensnaring female travelers traveling alone, particularly for business. ¹¹⁹
Housekeeping, Maintenance, and Room Services	Refusal of cleaning services for multiple days.	There is no empirical evidence to support this purported "indicium." Particularly following the COVID pandemic, refusal of cleaning services is common and, for disease safety, many hotels did not/do not provide it without explicit request.
Housekeeping, Maintenance, and Room Services	Smell of bodily fluids and musk.	There is no empirical evidence to support this purported "indicium." Publicly criticized for potentially ensnaring sexual activity between consenting adults and violations to rights to privacy. ¹²⁰
Housekeeping, Maintenance, and Room Services; as well as Concierge, Bellman, Front Desk, Security, and Valet Staff	The same person reserving multiple rooms.	There is no empirical evidence to support this purported "indicium." Larger families with more than four people, including my own, reserve multiple, adjacent rooms.
Housekeeping, Maintenance, and Room Services	Evidence of pornography.	There is no empirical evidence to support this purported "indicium." Publicly criticized for potentially ensnaring sexual activity between consenting adults and violations to rights to privacy. ¹²¹
Housekeeping, Maintenance, and Room Services	Provocative clothing and shoes.	There is no empirical evidence to support this purported "indicium." Publicly criticized for policing adult female clothing choice and violations to rights to privacy. ¹²²
Housekeeping, Maintenance, and Room Services	Excessive amounts of sex paraphernalia in rooms (condoms, lubricant, lotion, etc.)	There is no empirical evidence to support this purported "indicium." Publicly criticized for potentially ensnaring sexual activity between consenting adults and violations to rights to privacy. ¹²³
Concierge, Bellman, Front Desk, Security, and Valet Staff	Room paid for with cash or pre-loaded credit card.	There is no empirical evidence to suggest that paying cash for a room is a reliable indicium of trafficking. Moreover, this is a common need for

¹¹⁹ See, for example: Nolan Brown, E., *Are You a Woman Traveling Alone? Marriott Might Be Watching You*, Reason (2019), retrieved from: <https://reason.com/2019/02/05/hotel-surveillance-state-sex-trafficking/>; Song, S., *When Anti-Sex Trafficking Policies like the Marriott's Do More Harm Than Good*, Paper Magazine (Jan. 30, 2019), retrieved from: <https://www.papermag.com/marriott-hotels-sex-trafficking-training-2627520121.html?rebellitem=9#rebellitem9>.

¹²⁰ *Id.*

¹²¹ *Id.*

¹²² *Id.*

¹²³ *Id.*

Applicable Staff	Blue Campaign “General Indicator”	Countervailing Information
		homeless populations, as well as for survivors of domestic violence and other persons in need of emergency and temporary housing. Claiming that “accepting cash” is an indication of human trafficking is not only unsupported by empirical research, but suggests an elitist, unreliable, and subjective perception of reality. Denying rooms to homeless populations, simply due to mode of payment, can have legal repercussions. ¹²⁴
Concierge, Bellman, Front Desk, Security, and Valet Staff	Individuals leaving room infrequently, not at all, or at odd hours.	There is no empirical evidence to support this purported “indicium.”

Ultimately, given the lack of qualitative or quantitative evidence to support the efficacy of these purported “indicia” and interventions, they should be applied cautiously, if at all. While these so-called “indicia” have not been adequately empirically tested, extant reliable principles and scientific methods suggest that implementation and training of these “indicia” will have no bearing on a business’s ability to prevent, identify, or intervene against human trafficking on premises and may actually result in high rates of false accusations. At present, any suggestion otherwise is based on unsupported speculation or subjective belief.

Sensitivity and Specificity

Measures for sensitivity and specificity are basic tenets for evaluations of screening tools and interventions across disciplines. For example, in the field of criminology, these measures have been used to evaluate models and instruments regarding the prediction of violent re-offending¹²⁵ and to evaluate screening tools for assessing risk of suicide and self-harm among adult offenders.¹²⁶ These measures are generally accepted and recognized across disciplines as being appropriate for evaluating the reliability of performance factors, which is why various scholars, including myself, have noted the need for research to refine purported human trafficking indicators and “to develop and test the sensitivity and specificity of screening tools to identify victims of human trafficking” in a variety of settings (e.g., law enforcement, healthcare, social work, beauty, transportation, banking, hospitality, agriculture, etc.).¹²⁷

¹²⁴ In Ireland, a homeless family was awarded €22,000 in compensation after a hotel refused to honor their booking without a credit card. See Lucey, S., *Hotel discriminated against homeless family by demanding credit card*, Irish Legal News (Mar. 2, 2022), retrieved from: <https://www.irishlegal.com/articles/hotel-discriminated-against-homeless-family-by-demanding-credit-card>.

¹²⁵ DeLisi, Matt, and Michael G. Vaughn. *The Gottfredson–Hirschi critiques revisited: Reconciling self-control theory, criminal careers, and career criminals*. International Journal of offender therapy and comparative criminology, 52.5, 520-537 (2008).

¹²⁶ Perry, Amanda E., et al. *Screening tools assessing risk of suicide and self-harm in adult offenders: a systematic review*, International Journal of Offender Therapy and Comparative Criminology, 54.5, 803-828 (2010).

¹²⁷ See, for example, Hemmings, Stacey, et al. *Responding to the health needs of survivors of human trafficking: a systematic review*, BMC Health Services Research 16.1, 1-9 (2016), retrieved from: <https://bmchealthservres.biomedcentral.com/counter/pdf/10.1186/s12913-016-1538-8.pdf>.

[REDACTED]

Although the efficacy of available interventions for sex trafficking victim identification and third-party intervention is relatively unknown, I can, to a reasonable degree of social scientific certainty, opine that many of the “red flags” touted by the Plaintiff’s proposed experts have low rates of sensitivity and specificity.

Specifically, the Plaintiff’s named experts claim that large cash withdrawals and payments from one individual to another are indicia or sex trafficking. For example, in her report, Ms. Carr writes:

“In my opinion, the indictment combined with the previous knowledge of accusations of Epstein’s use of cash to pay for sex with minors plus the scope of his cash withdrawals are extremely strong, if not conclusive, indications of sex trafficking.”¹²⁸

Not only does Ms. Carr fail to provide any empirical basis for her conclusion, but these purported “indicia” are completely absent from “best practice” guidance documents on anti-trafficking interventions for the financial services industry that were available at the time of the alleged victimization period, as well as apparently absent from those that were developed thereafter. Additionally, based on my research, education, and experience, these purported indicia are hypothesized to have low rates of sensitivity and specificity.

Herein, the term sensitivity is defined as the ability of law enforcement, service providers, and other third parties to correctly identify true victims of human trafficking (true positive). The term specificity refers to the ability of law enforcement, service providers, and other third parties to correctly identify persons who are not victims of human trafficking (true negative).

In regard to sex trafficking victim identification, low sensitivity means that even if these protocols were implemented, victims of human trafficking would continue to be misidentified as non-victims, criminals, or co-conspirators. Low specificity means that even if these protocols were implemented, persons who are not victims of human trafficking would be misidentified as being possible victims.

These hypotheses are informed by my background, training, and expertise on the high rates of misidentification of victims even by trained professionals, including law enforcement. Moreover, there is a growing body of civil litigation regarding misidentification resulting from misguided “red flag” training on human trafficking.

A human trafficking “red flag” training or indicia with low specificity can be criticized as being too eager to find a positive result, even when it is not present. Implementing a human trafficking “red flag” training or indicia that has not been tested for sensitivity or specificity could result in false accusations/investigations of human trafficking against law abiding citizens.

¹²⁸ Carr Report, ¶ 86.

[REDACTED]

Ultimately, although anti-trafficking training and interventions may be well-intentioned, they are largely untested or unsupported by rigorous empirical research. Extant information suggests that many “indicia” have low rates of specificity and misidentification, as well as missed opportunities for intervention, persist. More importantly, there is no reliable, empirical, or evidentiary basis for the legal conclusions leveled by the Plaintiff’s named experts or the allegation that cash withdrawals are an indication of sex trafficking, much less a strong or conclusive indicator. It is more likely than not that even if JPMC had instituted an additional screening requirement for “cash withdrawals” on “high risk” clients, it would have had no measurable impact on Epstein’s criminal activity.

VIII. “BEST PRACTICES” IN THE FINANCIAL SERVICES INDUSTRY

Opinion

There is no reliable formula or common, generalizable indicia that JPMC could have used to make an actionable determination of trafficking in this particular case. Additionally, although there is no reliable intervention that JPMC could have used to prevent Epstein’s criminal activity, JPMC nevertheless chose to end the banking relationship with Epstein six years prior to his trafficking indictment for alleged pre-2006 conduct.

Basis

The potential “indicators” of trafficking advised to the financial services industry by various organizations have not been empirically validated and include very few “signs” that would typically catalyze law enforcement intervention.

Moreover, as previously discussed, the Plaintiff’s own named expert acknowledges that “the framework of legislation, regulations, and other measures needed to engage companies in the eradication of human trafficking...(was) still in the *early stages of development*” in 2014.¹²⁹ This is consistent with the fact that, although the TVPA was passed in 2000, the majority of guidance for businesses was released after 2014 (see, for examples, Figure 8), but has yet to be empirically tested for sensitivity and specificity.

¹²⁹ Emphasis added. Carr, Bridgette, et al., *Human trafficking law and policy*, LexisNexis, p. 181 (2014)..

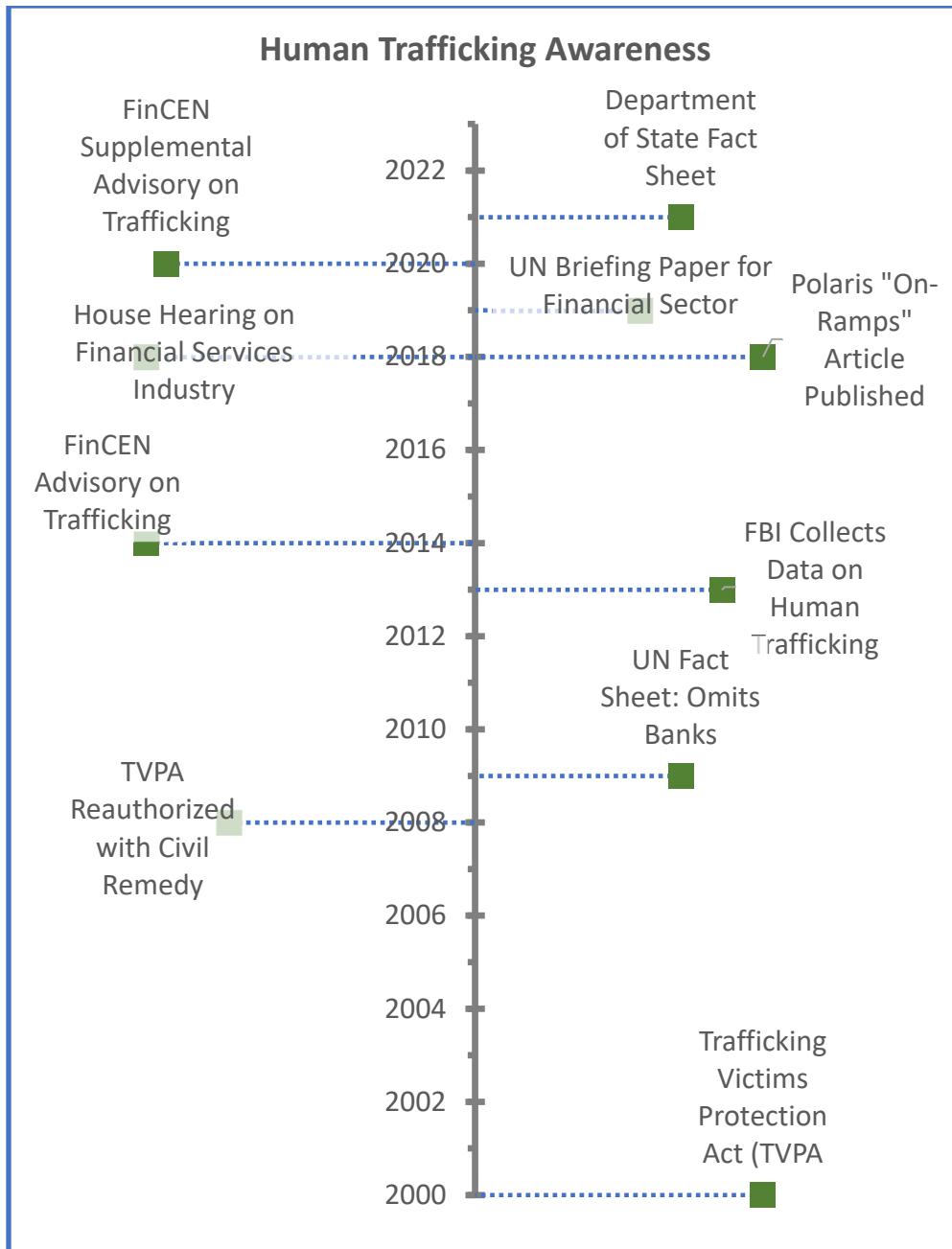


Figure 8. Sample of Human Trafficking Awareness and the Banking Industry 2000 to Present

For example, in 2009, the United Nations Office on Drugs and Crime published a fact sheet on human trafficking. While the fact sheet mentioned that “no industry or economic sector is immune to human trafficking,” it omitted any reference to banks, much less any guidance for

[REDACTED]

the financial services industry.¹³⁰ This is likely because data was very limited at the time. In fact, the largest data collection on crime in the United States—the FBI Uniform Crime Report (UCR)—did not even collect data on human trafficking until 2013.¹³¹ “Best practice” guidance on how the financial services industry became more widely disseminated in 2014, with the United States Department of Treasury, Financial Crimes Enforcement Network (FinCEN) Advisory on Human Trafficking,¹³² followed by reports by the Polaris Project,¹³³ House Hearings¹³⁴, United Nations Briefings,¹³⁵ Supplemental Guidance from FinCEN¹³⁶ and a Fact Sheet from the U.S. State Department.¹³⁷

Additionally, even in 2018, various anti-trafficking advocates were acknowledging that these purported “red flags” were constantly changing. For example, at a Congressional hearing entitled *Following the Money: How Human Traffickers Exploit U.S. Financial Markets*,¹³⁸ Bassem Banafa, a Financial Forensics Consultant, and Tina Frundt, human trafficking survivor, as well as Founder and Director of Courtney’s House, testified that many financial institutions were collaborating with social service organizations to identify red flags of trafficking, but they were “**changing constantly.**”

Even if these purported trafficking indicia were available at the time of the alleged victimization period, which they were not, and even if these purported trafficking indicia were static and reliably based in empirical research, which they are not, it is more likely than not that these

¹³⁰ U.N. Office on Drugs and Crime, *Human Trafficking FAQs*, retrieved from: <https://www.unodc.org/unodc/en/human-trafficking/faqs.html>.

¹³¹ FBI: UCR, *2019 Crime in the United States, Human Trafficking*, retrieved from: <https://ucr.fbi.gov/crime-in-the-u-s/2019/crime-in-the-u-s-2019/additional-data-collections/human-trafficking>.

¹³² U.S. Dep’t of Treas., FinCEN, *Advisory: Guidance on Recognizing Activity that May be Associated with Human Smuggling and Human Trafficking – Financial Red Flags*, (Sept. 11, 2014), retrieved from: <https://www.fincen.gov/sites/default/files/advisory/FIN-2014-A008.pdf>.

¹³³ Polaris, *On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking, Financial Services Industry*, (2018), retrieved from: <https://polarisproject.org/wp-content/uploads/2018/08/A-Roadmap-for-Systems-and-Industries-to-Prevent-and-Disrupt-Human-Trafficking-Financial-Industry.pdf>.

¹³⁴ See, e.g., *Following the Money: How Human Traffickers Exploit U.S. Financial Markets: Hearing Before the Subcomm. on Oversight & Investigations of the H. Comm. On Fin. Servs.*, 115 Cong. (Jan. 30, 2018), retrieved from: <https://www.govinfo.gov/content/pkg/CHRG-115hhrg31327/html/CHRG-115hhrg31327.htm>.

¹³⁵ See, e.g., Kovick, David & Davis, Rachel, *Tackling Modern Slavery and Human Trafficking at Scale Through Financial Sector Leverage*, (2019), retrieved from: <https://shiftproject.org/wp-content/uploads/2020/01/SecretariatBriefingPaper2.pdf>.

¹³⁶ U.S. Dep’t of Treas., FinCEN, *Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity*, (Oct. 12, 2020), retrieved from: https://www.fincen.gov/sites/default/files/advisory/2020-10-15/Advisory%20Human%20Trafficking%20508%20FINAL_0.pdf.

¹³⁷ U.S. Dep’t of State, Off. to Monitor & Combat Trafficking in Persons, *The Role of the Financial Sector: Promising Practices in the Eradication of Trafficking in Persons*, (June 2021), retrieved from: https://www.state.gov/wp-content/uploads/2021/06/The-Role-of-the-Financial-Sector-Promising-Practices-in-the-Eradication-of-Trafficking-in-Persons_LOW.pdf.

¹³⁸ *Following the Money: How Human Traffickers Exploit U.S. Financial Markets: Hearing Before the Subcomm. on Oversight & Investigations of the H. Comm. On Fin. Servs.*, 115 Cong. (Jan. 30, 2018), retrieved from: <https://www.govinfo.gov/content/pkg/CHRG-115hhrg31327/html/CHRG-115hhrg31327.htm>.

[REDACTED]

indicia would not have led to any intervention regarding Epstein's crimes (for examples, see Table 4).

Table 4. FinCEN Red Flags of Human Trafficking: 2014¹³⁹

FinCEN "Red Flag": 2014	Application to Present Case
"A business customer does not exhibit normal payroll expenditures (e.g., wages, payroll taxes, social security contributions). Payroll costs can be non-existent or extremely low for the size of the customer's alleged operations, workforce and/or business line/model."	Not alleged and/or not supported by extant discovery.
"Substantial deductions to wages. To the extent a financial institution is able to observe, a customer with a business may deduct large amounts from the wages of its employees alleging extensive charges (e.g., housing and food costs), where the employees only receive a small fraction of their wages; this may occur before or after the payment of wages."	Not alleged and/or not supported by extant discovery.
"Cashing of payroll checks where the majority of the funds are kept by the employer or are deposited back into the employer's account. This activity may be detected by those financial institutions that have access to paystubs and other payroll records."	Not alleged and/or not supported by extant discovery.
"Transactional activity (credits and/or debits) inconsistent with a customer's alleged employment, business or expected activity, or where transactions lack a business or apparent lawful purpose."	Not supported by extant discovery. ¹⁴⁰
"Cash deposits or wire transfers are kept below \$3,000 or \$10,000 in apparent efforts to avoid record keeping requirements or the filing of Currency Transaction Reports (CTR), respectively."	Alleged, but JPMC filed SARs in 2002 and 2003 reporting such activity.
"A customer's account appears to function as a funnel account, where cash deposits occur in cities/states where the customer does not reside or conduct business. Frequently, in the case of funnel accounts, the funds are quickly withdrawn (same day) after the deposits are made."	Not alleged and/or not supported by extant discovery.
"Multiple, apparently unrelated, customers sending wire transfers to the same beneficiary. These wire senders may also use similar transactional information including but not limited to a common address and phone number. When questioned to the extent circumstances allow, the wire senders may have no apparent relation to the recipient of the funds or know the purpose of the wire transfers."	Not alleged and/or not supported by extant discovery.
Transactions conducted by individuals, escorted by a third party (e.g., under the pretext of requiring an interpreter), to transfer funds (that may seem to be their salaries) to other countries."	Not alleged and/or not supported by extant discovery.
Frequent payments to online escort services for advertising, including small posting fees to companies of online classifieds as well as more expensive, higher-end advertising and website hosting companies.	Not alleged and/or not supported by extant discovery.
Frequent transactions, inconsistent with expected activity and/or line of business, carried out by a business customer in apparent efforts to provide sustenance to individuals (e.g., payment for housing, lodging, regular vehicle rentals, purchases of large amounts of food).	Not alleged to be known by JPMC at the time.
Payments to employment or student recruitment agencies that are not licensed/registered or that have labor violations.	Not alleged and/or not supported by extant discovery.
A customer establishes an account or visits a branch to conduct transactions while always escorted by a third party (e.g., under the pretext of requiring an interpreter).	Not alleged and/or not supported by extant discovery.

¹³⁹ As Pesce points out, "JPMC's monitoring was consistent with FinCEN's future guidance. If JPMC had been monitoring Epstein's transactions against the red flags issued by FinCEN in 2014, they would not have alerted for review." Pesce Report, ¶ 97.

¹⁴⁰ While this is alleged by the Plaintiff, there is no evidence in the record or empirical evidence to support this contention.

FinCEN “Red Flag”: 2014	Application to Present Case
Correspondingly, the third party escorting the customer may always have possession of the customer’s ID.	
Common signer(s)/custodian(s) in apparently unrelated business and/or personal accounts. Similarly, common information (e.g., address, phone number, employment information) used to open multiple accounts in different names.	Not alleged and/or not supported by extant discovery.
Accounts of foreign workers or students where the employer or employment agency serves as a custodian.	Not alleged and/or not supported by extant discovery.
Unexplained/unjustified lifestyle incommensurate with employment or business line. Profits/deposits significantly greater than that of peers in similar professions/ business lines.	Not alleged and/or not supported by extant discovery.
Inflows are largely received in cash where substantial cash receipts are inconsistent with the customer’s line of business. Extensive use of cash to purchase assets and to conduct transactions.	Not alleged and/or not supported by extant discovery.

Based on my review of the extant discovery, the FinCEN “red flags” of human trafficking that were available in 2014 either do not appear to be consistently evident in the present case, or were not alleged to have been observed by JPMC. Six years later, in 2020, FinCEN released a Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity,¹⁴¹ which contained a number of “behavioral indicators” and these also are not consistently evident in the allegations regarding the present matter or are not alleged to have been observed by JPMC (see Table 5).

Table 5. FinCEN Behavioral Indicators of Human Trafficking: 2020

FinCEN “Behavioral Indicators”: 2020	Application to Present Case
A third party speaks on behalf of the customer (a third party may insist on being present and/ or translating).	Not alleged and unsupported by extant discovery.
A third party insists on being present for every aspect of the transaction.	Not alleged and unsupported by extant discovery.
A third party attempts to fill out paperwork without consulting the customer.	Alleged regarding [REDACTED].
A third party maintains possession and/or control of all documents or money.	Not alleged and unsupported by extant discovery.
A third party claims to be related to the customer, but does not know critical details.	Not alleged and unsupported by extant discovery.
A prospective customer uses, or attempts to use, third-party identification (of someone who is not present) to open an account.	Not alleged and unsupported by extant discovery.
A third party attempts to open an account for an unqualified minor.	Not alleged and unsupported by extant discovery.
A third party commits acts of physical aggression or intimidation toward the customer.	Not alleged to have been observed by JPMC.
A customer shows signs of poor hygiene, malnourishment, fatigue, signs of physical and/or sexual abuse, physical restraint, confinement, or torture.	Not alleged and unsupported by extant discovery.
A customer shows lack of knowledge of their whereabouts, cannot clarify where they live or where they are staying, or provides scripted, confusing, or inconsistent stories in response to inquiry.	Not alleged and unsupported by extant discovery.

¹⁴¹ U.S. Dep’t of Treas., FinCEN, *Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity*, (Oct. 15, 2020), retrieved from: https://www.fincen.gov/sites/default/files/advisory/2020-10-15/Advisory%20Human%20Trafficking%20508%20FINAL_0.pdf.

[REDACTED]

Ultimately, the Plaintiff and the Plaintiff's named experts can point to no policies, procedures, or internal controls employed by JPMC that were less than industry standards at the time. More importantly, the financial services industry was repeatedly recognized for its efforts to combat trafficking in persons. For example, in 2018 anti-trafficking nonprofit Polaris published a report stating, in part, "the financial services industry should be applauded for its innovative and proactive efforts to meet this challenge and continue its efforts to stay on top of shifting patterns."¹⁴²

Similarly, Mr. Cyrus Vance, District Attorney for New York County, also testified about "working closely with banks and financial institutions." Mr. Vance remarked that the collaborative partnerships with banks were so effective that traffickers had turned to "alternative methods of payment" to "allow them to remain anonymous, such as prepaid gift cards and cryptocurrencies."¹⁴³ Unlike the traditional banking industry, some members of the cryptocurrency community were "specifically catering to traffickers," according Mr. Vance, who requested legislative and regulatory solutions to address trafficking facilitation from cryptocurrency.¹⁴⁴

Based on the information reviewed in this case, like much of the financial services industry, JPMC appears to have employed innovative and proactive efforts to meet the challenge of combating trafficking in persons and made efforts stay on top of shifting patterns. As proof to this point, JPMC ***chose to proactively*** end their business relationship with Epstein ***six years before*** law enforcement indicted him for any trafficking offense, even when there was no legal requirement to do so.

¹⁴² Polaris Project, *On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking*, at p. 61, (July 2018), retrieved from: <https://polarisproject.org/wp-content/uploads/2018/08/A-Roadmap-for-Systems-and-Industries-to-Prevent-and-Disrupt-Human-Trafficking.pdf>.

¹⁴³ Following the Money: How Human Traffickers Exploit U.S. Financial Markets: Hearing Before the Subcomm. on Oversight & Investigations of the H. Comm. On Fin. Servs., 115 Cong. (Jan. 30, 2018), retrieved from: <https://www.govinfo.gov/content/pkg/CHRG-115hhrg31327/html/CHRG-115hhrg31327.htm>.

¹⁴⁴ *Id.*

IX. ACTUAL OR CONSTRUCTIVE KNOWLEDGE

Opinion

Based on my research, education, and experience, there were no reliable indicia of trafficking available to the financial services industry during the alleged victimization period in the present matter. Moreover, there are no reliable data or research to support the conclusion that the scope of Epstein's cash withdrawals rises to the level of establishing a private business knew or should have known that he was engaged in sex trafficking. Any suggestion otherwise is based on misinformation, unsupported speculation or subjective belief, ecological fallacies, or fallacies of composition, and is counterfactual. Establishing actual or constructive knowledge in a third party liability case involving a TVPRA claim would require, at a minimum, the availability of an evidence-based and reliable indicia. However, even in the absence of reliable indicators and legal requirements JPMC chose to proactively sever the relationship with Epstein six years prior to his trafficking indictment.

Basis

In general, alleged victims of sex trafficking involving third parties may assert that there were subtle “red flags” that should have been noticed. For example, in the hotel industry, plaintiffs and purported experts may contend that asking for extra towels, turning down room service, or having multiple cell phones, “excessive” condoms, lingerie, and gift cards in the room are “red flags” of trafficking that hotel staff should have noticed and acted upon these purported indicia. Similarly, in the present matter the Plaintiff and the Plaintiff’s named experts claim that cash withdrawals and round-dollar wire payments are “strong” or “conclusive” evidence of trafficking. I am not aware of any empirical evidence to support the reliability of these “red flags” and anecdotal data suggests these that these supposed “red flags” have low rates of sensitivity and specificity¹⁴⁵ in a business setting. Moreover, even if these purported “red flags” were reported by employees to law enforcement, most of them are not illegal and are therefore unactionable. As such, there is no evidence to support the conclusion that the scope of Epstein’s cash



Figure 9. Blue Lightning Initiative for Aviation Personnel "Indicators"

¹⁴⁵ Low sensitivity herein means that victims of human trafficking are often misidentified as non-victims, criminals, or co-conspirators. Low specificity herein means that persons who are not victims of human trafficking are often misidentified as being victims.

[REDACTED]

withdrawals or round-dollar wire payments rise to the level of establishing a private business knew or should have known that he was engaged in sex trafficking.

In a private business setting, relying upon unsupported indicia to catalyze interventions may be impracticable and can expose the business to allegations of civil rights violations and/or defamation.

For instance, as previously mentioned, one of the supposed “indicators” or “red flags” that private businesses in the aviation industry were trained on was “a non-genuine relationship; particularly parent/guardian-child” (see Figure 9).¹⁴⁶ However, there was absolutely no empirical evidence to support this “indicator” or “red flag” as being a valid indicium of trafficking and anecdotal evidence suggests that it may have remarkably low rates of specificity. According to multiple airline patrons, employees began falsely accusing and/or initiating investigations for trafficking against predominately mixed-race passengers, even though they were law abiding (for example, see *DelVecchia v. Frontier Airlines, Inc.*, Case No. 2:19-cv-01322-KJD-NJK (D. Nev.).

¹⁴⁶ Blue Lightning Initiative, *A Guide for Aviation Personnel to Recognize and Report Suspected Human Trafficking*, Hidden in Plane Sight <http://hiddeninplanesight.org/wp-content/uploads/afa-cobranded-blue-lightning-pocket-guide-5.pdf>.

X. REBUTTAL

Bridgette Carr

Credentials

Ms. Carr is an attorney in good standing with the Michigan Bar,¹⁴⁷ who has not previously testified as an expert in any trial or deposition.¹⁴⁸ According to Ms. Carr's resume, which is included as Exhibit A of her report, she has served as a professor at the University of Michigan Law School for the last 12 years, as well as a co-director of the human trafficking clinic and lab at the law school. While Ms. Carr certainly has a wealth of experience providing direct legal representation to victims of human trafficking and immigrants, from the information provided Ms. Carr does not appear to have the education, experience, or expertise to empirically assess the reliability of social scientific research, including that of trafficking entrapment and enmeshment schemes, indicia, and anti-trafficking interventions. Instead of applying any reliable or generally accepted methodology to inform her opinions in the present matter, the overwhelming majority of Ms. Carr's report attempts to support her opinions through her anecdotal experiences and epistemic trespassing assessments of extant research, as opposed to reliable methods.

Methodology

Ms. Carr's so called "methodology" is outlined on page 3, paragraphs 13-15, of her report.

Ms. Carr claims that she will be offering opinions in four areas:¹⁴⁹

1. How sex trafficking presents in cases in the United States;
2. Typical signs of human trafficking;
3. The power dynamics at work in human trafficking; and
4. How victim vulnerabilities are identified and exploited.

In support of these opinions, Ms. Carr relies upon nondescript sources of information, which she conceptualizes as "methodologies." With regards to her generalized assessment:

1. Ms. Carr applies her knowledge of human trafficking to the documents, depositions, victims' statements, and other information to assess whether Jeffrey Epstein's behavior and the victims' experiences are consistent with human trafficking of minors or adults; and

¹⁴⁷ Carr Report, ¶ 3.

¹⁴⁸ *Id.* ¶ 7.

¹⁴⁹ *Id.* ¶ 13.

2. Ms. Carr applies her knowledge of human trafficking to the documents, depositions, victims' statements, and other information to assess whether the information identified by or available to JPMorgan Chase Bank, N.A. reflects "red flags" of trafficking.¹⁵⁰

The application of Ms. Carr's "knowledge of human trafficking" to the discovery materials does not appear to be a reliable "methodology," but rather a subjective interpretation of discovery, which is no different than a non-scientific process employed by any trier of fact.

For example, with regards to her specific assessment:

1. Ms. Carr first claims that she reviewed "authoritative literature" in the field of human trafficking to identify "generally accepted and reliable typologies and indicators of trafficking;"¹⁵¹
2. Next, Ms. Carr claims that she applied these "typologies and indicators" to the documents and testimony that she reviewed, including documents and financial information available to, reviewed by, or created by JPMorgan;¹⁵²
3. Ms. Carr also conducted "an interview" with [REDACTED], who she concludes is an Epstein victim, despite [REDACTED] being previously categorized as a co-conspirator by law enforcement;¹⁵³ and
4. Finally, Ms. Carr "assess[ed]" whether the aforementioned information is "consistent with typologies and indicators of human trafficking."¹⁵⁴

As introduced in Section II of this report, a methodology is generally understood to reference the specific methods, procedures, or practices needed to derive or interpret data within the scope of a particular discipline. The reliability of the methodology is then dependent on the accuracy of the results, which is typically measured through the statistical consistency of the findings.

The reliability of Ms. Carr's so-called methods is questionable at best for a number of reasons, which are discussed further in the section below, but include:

1. Ms. Carr's review of the "authoritative literature" was not systematic or replicable. She did not perform any assessment on the methodological rigor of the research or the generalizability of the findings. Moreover, she failed to reference any research, method, or finding that could be used to assess the reliability of the "typologies and indicators of trafficking" that she references, much less any meta-analysis that would suggest a "general acceptance" or consistency of these findings;
2. Ms. Carr does not appear to be formally trained in conducting qualitative interviews. While she may have anecdotal experience in conducting interviews of her clients through her capacity as an attorney providing legal services to victims of trafficking, this is not

¹⁵⁰ *Id.* ¶ 13.

¹⁵¹ *Id.* ¶ 14.

¹⁵² *Id.*

¹⁵³ *Id.*

¹⁵⁴ *Id.*

[REDACTED]

tantamount to a methodology that could be assessed for reliability and objectivity in empirical interpretation; and

3. The reliability of Ms. Carr's so-called methodology is further brought into question by her claim to have "assessed" whether the discovery is consistent with "typology and indicators of trafficking." Even if all allegations and Plaintiff testimony are accepted as true, descriptive comparisons clearly illustrate that the present matter is significantly atypical of trafficking trends in the United States. Ms. Carr provides absolutely no objective data or method to suggest otherwise; therefore, the basis of her opinion remains wholly unclear and, more likely than not, subjective and/or skewed by confirmation bias.

While Ms. Carr claims to have "arrived" at her testimony by "applying the principles and methods commonly used in the field of human trafficking in the United States," she fails to define what "principles" or "methods" she used. The closest Ms. Carr comes to describing what could possibly be considered a "method" would be her claim to have conducted a "review" of the "authoritative literature." Ms. Carr does not explain whether her "review" was narrative, integrative, semi-systematic, or systematic,¹⁵⁵ nor does she define what constitutes "authoritative" research in her opinion.

Moreover, although Ms. Carr fails to specify the type of "review" she conducted, it appears that her methodology consisted of nothing more than a narrative review or literature review, at best. A narrative review or literature review is the type first-year college students often learn as a general approach to research. Its purpose is to identify a few studies that describe a problem of interest. Narrative reviews and literature reviews *should* have no predetermined research question or specified search strategy, only a topic of interest;¹⁵⁶ however, they also be affected by intentional or unintentional "cherry-picking" of a subset of research to lead to a desired finding or conclusion.

Traditional literature reviews or narrative reviews often lack thoroughness and rigor, can be affected by bias, and are conducted ad hoc, rather than following a specific methodology.¹⁵⁷ They are not systematic and there are no standards or protocols used to guide the review. As such, although the reviewers may learn something about the problem, they will not arrive at a comprehensive understanding of the state of the science related to the problem and the findings will have no articulable reliability, *per se*.¹⁵⁸

¹⁵⁵ *Supra*, Section II.

¹⁵⁶ Science Direct, n.d, *Narrative Review*, retrieved from:

<https://www.sciencedirect.com/topics/psychology/narrative-review>.

¹⁵⁷ Hannah Snyder, *Literature review as a research methodology: An overview and guidelines*, Journal of Business Research, vol. 104, pp. 333-339 (Nov. 2019), <https://doi.org/10.1016/j.jbusres.2019.07.039>.

¹⁵⁸ Science Direct, n.d, *Narrative Review*, retrieved from:

<https://www.sciencedirect.com/topics/psychology/narrative-review>

Despite conceptualizing her “review” of “authoritative literature” as a “methodology,” Ms. Carr provided no list of databases that were searched or any Boolean¹⁵⁹ search phrase that was used to identify literature (for example, see Figure 10).¹⁶⁰

Search method	Keywords	Constraints	Exclusion
Title search	TITLE("modern slavery" OR "trade in human being" OR "human trafficking" OR "trafficking in human" OR "lab*" trafficking" OR "forced lab*" OR "compulsory lab*" OR "sex* traffick" OR "sex* trade" OR "trafficking in persons" OR "traffick* person" OR "traffick* wom" OR "traffick* people" OR "traffick* girl" OR "wom* traffick" OR "child* traffick" OR "organ traffick" OR "transplant tourism" OR "trafficking in wom" OR "traffick* in organ" OR "forced prostit" OR "trafficking of child" OR "trafficking of wom" OR "sex* slavery" OR "commercial sexual exploitation" OR "lab* traffick" OR "organ trade" OR "forced marriage" OR "bonded lab" OR "child harvesting" OR "modern slavery" OR "child prostitut" OR "forced prostitut" OR "domestic servitude" OR "debt bondage" OR "debt slavery" OR "bonded lab*" OR "child pornography")	NONE	AND NOT TITLE-ABSTRACT (insect or droso* OR sexta OR cell OR molecular OR biology OR leukocyte* OR DNA)

Figure 10. Sample Boolean Search Phrase

As such, the “reliability” of the findings from her so-called methodology are questionable at best.

Opinions

Despite the vague and non-scientific methodology used by Ms. Carr she proffered 11 opinions on the present matter, which are summarized on page 77 of her report; each discussed further in the section below.

Carr Opinion A: Human trafficking presents in different ways but has the same core elements.

While I do agree that human trafficking presents in different ways, I disagree with Ms. Carr on the elements that are consistent across trafficking cases. In support of her opinion, Ms. Carr claims that there are two core elements:

1. Targeting of vulnerable individuals; and
2. Compelled service.¹⁶¹

Ms. Carr provides no citation for her opinion, which seems to be based on nothing more than a simplified and generalized background of human trafficking. Ms. Carr may have chosen to focus on a general application of “core elements,” as opposed to “trends” and “commonalities” across cases, because the later would illustrate the atypicality of the present allegations, when compared to human trafficking cases, and perhaps expose limitations with regards to reliability. For example, Ms. Carr’s colleague and mentor, Luis C.deBaca previously issued reports in separate matters, which identified what he perceived were “trends” and “commonalities” of coercion across cases (see Table 6). Only two of Mr. C.deBaca’s purportedly generalizable “trends” and/or “commonalities” were consistent across the cases for which he issued the reports:

1. Overt threats and violence; and
2. The effect of official corruption on trafficking victims’ willingness to come forward.

¹⁵⁹ *Supra*, Section II.

¹⁶⁰ Sampled from Sweileh, W.M., *Research trends on human trafficking: a bibliometric analysis using Scopus database*, Global Health vol. 14, 106 (2018), <https://doi.org/10.1186/s12992-018-0427-9>.

¹⁶¹ Carr Report, ¶ 16.

Table 6. “Trends” and/or “Commonalities” Identified by Luis C.deBaca in Separate Cases

Case 1 “Trends”¹⁶²	Case 2 “Trends”¹⁶³
Holding of passports or other identification documents.	
Physical isolation and control of movement.	
Leveraging of pre-existing debt, smuggling debts, or recruitment fees.	
Levying additional debts in the workplace (the “company store”).	
Unsafe work environment.	
Overt threats and violence	Overt threats and violence.
The effect of official corruption on trafficking victims’ willingness to come forward.	The effect of State power and political corruption on workers’ willingness to come forward.
	Breach of contract, withholding of contracts, or substitution of contracts during the recruitment or transportation stages.
	Imbalances of power between guestworkers, recruiters, and their sponsoring employers.
	The particular vulnerabilities of workers on guestworker visas in the United States and other countries.
	The effect on foreign workers of both explicit threats and more subtle reminders of the potential for law enforcement or deportation.

While Mr. C.deBaca’s “trends” and/or “commonalities” can be evidenced in other trafficking cases, the Plaintiff cannot point to any evidence or testimony to suggest that JPMC was aware of any of these elements in the present matter. Instead of acknowledging the atypicality of the present matter and the inherent difficulty with third party identification of human trafficking crimes, Ms. Carr uses a broadened interpretation of general information and a subjective application of unreliable indicia to support her capricious opinions.

While I agree with Ms. Carr that human trafficking presents in different ways, the most consistent element across cases is exploitation. For example, using a sample of cases from a database developed by Ms. Carr (Appendix G), victims are often compelled to turn over all or most of their money to their trafficker; thus, illustrating the atypicality of the present matter.

Carr Opinion B: One Common Theme In Human Trafficking Is The Targeting Of Vulnerable People To Victimize.

While I do not disagree with this opinion in principle, Ms. Carr’s interpretation of the elements of vulnerability and the indicia of victimization are not rooted in state of the science research, but rather her subjective and anecdotal experience.

¹⁶² Rathav. Phatthana Seafood Co., Case No. 16-2-28453-1 KNT.

¹⁶³ Casilao v. Hotelmacher LLC, Case No. CIV-17-800-M; Francis v. Apex, USA, Case No: CIV-18-583-HE.

In support of this opinion, Ms. Carr cites “the first National Survivor Study” published by the Polaris Project in 2023.¹⁶⁴ Ms. Carr attempts to authoritatively claim that the study found that “[t]he vast majority of trafficking survivors faced trauma, abuse, poverty, mental health challenges, and other struggles in childhood,”¹⁶⁵ which is “consistent with” the experiences of her clients.¹⁶⁶ Ms. Carr ignores the fact that this study was based on a small, non-random sample of only 457 survivors and, more importantly, the authors of the report acknowledge, in bold, “our data is not representative of all trafficking survivors and generalizations about all survivors should not be made from this data.”¹⁶⁷ Yet, despite this limitation, which is clearly highlighted for readers, Ms. Carr irresponsibly and erroneously attempts to generalize these data to the present case and reference these findings as reliable fact.

Despite the dearth of empirical data, trafficking risk and targeting can be best conceptualized through the established theory related to Maslow’s hierarchy of needs, as discussed in my book, *Hidden in Plain Sight: America’s Slaves of the New Millennium*, (for reference, see Figure 11). Essentially, an individual at-risk of being trafficked, more often than not, has a void. In order to manipulate the victim, a trafficker typically makes a false promise that will ostensibly fulfill the respective void. As such, the determination of whether a trafficker coerced, defrauded, and/or exploited a particular victim is highly individualized by both victim risk and trafficker recruitment and control methods.



Figure 11. Maslow’s Hierarchy of Needs

While non-profits such as Polaris recognize that smaller, non-random surveys are “not representative of all trafficking survivors and generalizations about all survivors should not be made” from their data (emphasis in the text of the cited document), Ms. Carr repeatedly and inappropriately attempts to use her anecdotal experiences to make generalizable claims to the present matter, which are even inconsistent with the evidence in record.

For example, Ms. Carr states that based on her experience, victims have access to money and victims do not appear to be financially deprived because “traffickers may expect their victims to maintain a certain look, shop, obtain beauty services, and receive money for shopping or gifts for

¹⁶⁴ Carr Report, ¶ 26.

¹⁶⁵ *Id.*

¹⁶⁶ *Id.* ¶ 27.

¹⁶⁷ Polaris Project, *In Harm’s Way: How Systems Fail Human Trafficking Survivors, Survey Results from the First National Survivor Study*, p. 17 (Jan. 2023), <https://polarisproject.org/wp-content/uploads/2023/06/In-Harms-Way-How-Systems-Fail-Human-Trafficking-Survivors-by-Polaris.pdf>.

[REDACTED]

their birthday.”¹⁶⁸ Ms. Carr references no research and cites to no cases to support this claim, which, as stated, is inconsistent and atypical of trafficking. In reality, victims are often financially deprived and have little or no access to money during their trafficking period (for examples, see Appendix G). If they are provided with services, this is typically under the direction of the trafficker, not at the victims request, and the associated costs are quickly recouped through exploited labor.

Ms. Carr then claims that she “saw evidence that Epstein paid for clothes, haircuts and spa services. This is likely because Epstein wanted the women to look a certain way and was consistent with the trafficking venture.”¹⁶⁹ Not only is Ms. Carr’s statement atypical of most trafficking cases and speculative in nature, but it is also contradicted by evidence in the record. For example, [REDACTED] **asked** “for color and a cut” and **asked** whether she should “do Phillip for cut and Hubert for color¹⁷⁰.” After the **requested** services were provided, these purported victims often expressed gratitude. For example, after receiving her hair cut and color treatment, [REDACTED] wrote, “Hey Jeffrey!! Thank you sso (sic) much for hair ☺ here is a picture. Can’t wait til you get back! Xoxoxo¹⁷¹.” There is no reliable evidence to suggest that this was because Epstein wanted the women to look a certain way and was consistent with the trafficking venture.

Instead, many of the women who purported to be Epstein’s sexual assault victims (but are accused by others to be co-conspirators) often asked for the items and services they received in a manner that is inconsistent with typical trafficking claims. For example, [REDACTED] sister, [REDACTED] received gifts of cash and food, as well as concert and airline tickets.¹⁷² She also received money for rent, education, clothes, and dance supplies, as well as medical and dental treatment.¹⁷³ Moreover, like JPMC, none of the third parties encountered by Epstein’s sexual assault victims suspected trafficking, reported “red flags,” or were in a position to intervene.

The only case cited by Ms. Carr under her support for Opinion B was *United States v. Maksimenko*—a forced labor case from 2006, which Ms. Carr acknowledges that she worked on¹⁷⁴ and as such, should have had close familiarity. In her report, Ms. Carr references the Maksimenko case as an example of how victims “may feel they are in a loving or reciprocally affectionate relationship” through “sexual coercion.”¹⁷⁵ This is diametrically different from how Ms. Carr and her client described the victimization during an MSNBC interview in 2007, as well as how it is described in the court documents. (For examples, see Table 7):

¹⁶⁸ Carr Report, ¶ 29.

¹⁶⁹ *Id.*

¹⁷⁰ ESTATE_JPM005030; ESTATE_JPM005031

¹⁷¹ ESTATE_JPM005032

¹⁷² ESTATE_JPM018226, ESTATE_JPM018227.

¹⁷³ ESTATE_JPM018227.

¹⁷⁴ Carr Report, ¶ 2.

¹⁷⁵ *Id.* ¶ 30.

Table 7. Maksimenko Allegations, ILO Operational Indicators, and Application to the Present Matter

Maksimenko Allegation	ILO Operational Indicator¹⁷⁶	Application to the Present Matter
Victims thought that they would be working in Virginia, but ended up in Michigan. ¹⁷⁷	Deceived about the location of the job.	Not alleged.
Victims thought that they would be working as waitresses, but ended up working as erotic dancers.	Deceived about the nature of the job.	Alleged with countervailing evidence ¹⁷⁸
Victims were forced to work six days per week.	Excessive working days.	Not alleged.
Victims were forced to work 12 hours per day.	Excessive working hours.	Not alleged.
Victims had their passports confiscated.	Confiscation of documents.	Not alleged in a manner that is typical of trafficking. ¹⁷⁹
Victims were threatened with car-bombs and guns.	Threats of violence.	Not alleged.
A victim's mother was threatened.	Violence on family (threats or effective)	Not alleged.
Victims were assessed large debts for immigration.	Debt bondage.	Not alleged in a manner that is typical of trafficking. ¹⁸⁰
Victims were forced to earn \$1,000 per day and turn over their earnings to their trafficker.	Withholding of money/wages.	Not alleged.

Ms. Carr's description of the *Maksimenko* case in the report for the present matter appears to attempt to repackage the claims to match the facts of this case. While the *Maskimenko* case is typical of other trafficking cases, given the debt bondage, withholding of identification documents, excessive working days and hours, confiscation of money, overt threats, and violent

¹⁷⁶ Strong Indicators are coded in Red. Medium Indicators are coded in Yellow. Weak Indicators are coded in Green.

¹⁷⁷ Ms. Carr specifically stated, "They were met at the airport by Michael Aronov and Alex Maksimenko—the traffickers—and they were told that, 'You know what? Plans have changed. You're going to be going to Detroit.' *In the Shadows: Sex Slaves in America*. 2007. MSNBC. <https://www.msnbc.com/documentaries/watch/sex-slaves-in-america-44658243732>.

¹⁷⁸ While some of Epstein's alleged victims were told that the massages would have a sexual component, others claim that the sexual element was unexpected. This is not consistent with the type of deception about the nature of a job in a typical trafficking case, but rather the type of sexual harassment endemic in the massage therapy industry. JDoe JPMC 003402, at 003405; [REDACTED] Dep. Tr. 121:19-123:25, Mar. 3, 2023 (discussing the recruitment of [REDACTED]).

¹⁷⁹ While [REDACTED] alleged that on at least one occasion she had her passport confiscated, KLIMAN00000001, there is no evidence that this was done for the purpose of commercial sexual exploitation. Moreover, there is also evidence that Epstein's alleged victims travelled commercially both internationally and domestically and would therefore have had access to their identification documents. See, e.g., ESTATE_JPM018238 (noting domestic and overseas commercial flights for [REDACTED]). Additionally, documents in evidence illustrate that purported victims were often asked if they wanted to travel (E.g., ESTATE_JPM005196) or the purported victims proactively invited themselves to travel.

¹⁸⁰ While this is alleged by [REDACTED] in the Carr report (page 68), these allegations are inconsistent with the claims by others. Moreover, [REDACTED] was described as a co-conspirator by law enforcement in the 2007 non-prosecution agreement, as well as by other victims. Despite [REDACTED] claims, the records show that she received significant financial benefit from her relationship with Epstein. For example, according to Ms. Carr's Exhibit E from her report, [REDACTED] was paid a total of \$767,772.64 from 2003 to 2013.

[REDACTED]

acts, these case facts are very different from the allegations in the present matter. Not only does Ms. Carr's inconsistent and curated description undermine the reliability and objectivity of her testimony, but if allowed, it is at risk of significantly misinforming the trier of fact.

Last, in her support of Opinion B, Ms. Carr states that in many cases, she has “seen victims fear the police or fear they will be ignored.”¹⁸¹ Based on my research, experience, and education, I agree with this statement. However, Ms. Carr fails to acknowledge how this fact undermines the central theory of this case—that third party businesses should be liable for the failures of law enforcement and governmental authorities. In her support of this statement, Ms. Carr cites to an article by Amy Farrell, Meredith Dank, Ieke de Vries, Matthew Kafafian, Andrea Hughes, & Sarah Lockwood titled *Failing Victims? Challenges of the Police Response to Human Trafficking*. The article cited by Ms. Carr acknowledges that “Victims of human trafficking rarely self-report their victimization, and ***those around the victim such as family members are unlikely to bring victimization to the attention of the police.***”¹⁸² The study also found that “even when investigators are aware of human trafficking, ***they struggle to distinguish individuals engaged in sex work as perpetrators from people who may be victims of human trafficking.***”¹⁸³

As such, it is curious why Ms. Carr’s report attempts to hold a private business to a higher standard than the family members of victims and law enforcement.

Carr Opinion C: Human Trafficking Typologies And Red Flags Can Be Helpful When Assessing Potential Human Trafficking.

Again, while I agree with Ms. Carr’s opinion in principle, human trafficking typologies and red flags are most helpful when comparing typical facts to trends and commonalities, as evidenced across validated human trafficking cases.¹⁸⁴ Conversely, it is unhelpful and potentially misinformative to opine on the basis of unsupported speculation or subjective belief, ecological fallacies, fallacies of composition, or unreliable so-called “indicia” or “red flags.” Throughout her report, Ms. Carr demonstrates a clear and consistent misunderstanding on the reliability and/or generalizability of various data sources. For example, in an attempt to support her Opinion C, Ms. Carr cites to the Human Trafficking Hotline operated by Polaris as “verifiable data” on the prevalence of human trafficking, which is estimated as more than 32,000 cases between December 2007 to December 2016.¹⁸⁵ This is potentially misinformative considering that there is no confirmation on what percentage of those cases led to trafficking adjudications and these purported calls for service were not random. Nevertheless, Ms. Carr attempts to apply these non-generalizable data to the present case; specifically, applying the Polaris “typologies” to

¹⁸¹ Carr Report, ¶ 31.

¹⁸² Emphasis added, page 656. Farrell, A, Dank, M, de Vries, I, Kafafian, M, Hughes, A, Lockwood, S. *Failing victims? Challenges of the police response to human trafficking*. Criminol. Public Policy. 2019; 18: 649– 673.

¹⁸³ Emphasis added, page 659. Farrell, A, Dank, M, de Vries, I, Kafafian, M, Hughes, A, Lockwood, S. *Failing victims? Challenges of the police response to human trafficking*. Criminol. Public Policy. 2019; 18: 649– 673.

¹⁸⁴ Herein, a “validated human trafficking case” is defined as a case where a determination of trafficking was made either through a guilty plea or via adjudication by a trier of fact (e.g., a formal judgment on a disputed matter by a judge or a jury).

¹⁸⁵ Carr Report, ¶ 32-33.

[REDACTED]

what Ms. Carr categorizes as “Epstein’s behavior.” Not only is this purported “methodology” not based in reliable principles or methods, but Ms. Carr doesn’t even accurately apply these empirically unvalidated typologies in a narrative fashion, as discussed further below.

Residential Trafficking

For example, with regards to residential trafficking, Ms. Carr writes:

Residential: Residential sex trafficking recognizes a form of trafficking which occurs ‘within private households used...for commercial sex.’ In this typology, economic hardship is often used as a basis for the exploitation and ‘sex trafficking within residences informally used as brothels typically involves child victims.’¹⁸⁶

Although Ms. Carr claims that Epstein’s behavior fits into this human trafficking typology, she provides no reference to any citation for this assessment. Sex trafficking within residences, as referenced in her cited report, is referring to private households that cater to commercial sex buyers and are run as traditional brothels. Epstein’s victims do not affirmatively allege that they worked in a residential brothel. Moreover, in applying the “methods of control,” as identified by Polaris, to the present matter, the facts of the current case were predominately atypical from the cases reported to the hotline regarding residential brothels (see Table 8).

Table 8:Polaris Methods of Control in Residential Brothels¹⁸⁷ versus Allegations Against Epstein.

Method of Control	Application to the Present Matter
Physical violence	Not alleged in a manner that is typical of trafficking
Lethal threats to victims	Not alleged
Lethal threats to victims’ families	Not alleged
Debt bondage	Not alleged
Extreme confinement	Not alleged
Monitoring	Not alleged in a manner that is typical of trafficking ¹⁸⁸
Addiction to illicit substances	Not alleged
Threats to harm or expose	Not alleged
Exploitation of familial or intimate relationship	Not alleged in a manner that is typical of trafficking

Escort Services

¹⁸⁶ *Id.* ¶ 35a.

¹⁸⁷ Polaris claims these findings were based on 1,290 cases reported over the course of approximately nine years.

¹⁸⁸ In fact, some of the documents in evidence could be used to suggest that certain alleged victims were attempting to monitor Epstein’s whereabouts. For example, ESTATE_JPM005034; ESTATE_JPM005137; ESTATE_JPM005151; ESTATE_JPM005174; ESTATE_JPM005184; and ESTATE_JPM005195.

Next, with regards to escort services, Ms. Carr writes:

This typology includes commercial sex acts “...that primarily occur at a temporary indoor location.” The trafficker profile ranges from individuals, often intimate partners, to coordinated networks. In this typology, victims are often recruited through fraud whether it’s “...fraudulent job offers, such as fake modeling contracts” or by the trafficker pretending to have affection for the victim.²⁶ The majority of victims are United States citizen women and girls. Traffickers use a variety of methods of control in this typology including conditioning “...victims to believe they are the only ones who care for them, manipulating an attachment bond that makes the decision to leave the trafficker extremely difficult.”¹⁸⁹

Again, although Ms. Carr claims that Epstein’s behavior also fits into this human trafficking typology, she provides no reference to any citation for this assessment. Escort service sex trafficking, as referenced in the cited Polaris report, is referring to commercial sex acts that occur at temporary indoor locations, which are often described as “out-call,” where traffickers deliver victims to a commercial sex consumer’s hotel room or residence for “private parties,” or as “in-call,” where potential commercial sex consumers cycle in and out of a temporary domicile, such as a hotel room. Epstein’s victims do not affirmatively allege that they provided escort services. Moreover, in applying the “methods of control,” as identified by Polaris, to the present matter, the facts of the current case were predominately atypical from the cases reported to the hotline regarding escort services (see Table 9).

Table 9: Polaris Methods of Control in Escort Services¹⁹⁰ versus Allegations Against Epstein.

Method of Control	Application to the Present Matter
Extreme physical violence, often accompanied by weapons	Not alleged
Extreme sexual violence, often accompanied by weapons	Not alleged in a manner that is typical of trafficking
Unmanageable quotas	Not alleged
Debts	Not alleged in a manner that is typical of trafficking
Threats of harm	Not alleged
Threats of police involvement	Not alleged
Excessive monitoring	Not alleged in a manner that is typical of trafficking
Gang intimidation	Not alleged
Social isolation	Not alleged
Constant surveillance	Not alleged in a manner that is typical of trafficking

¹⁸⁹ Carr Report, ¶ 35b.

¹⁹⁰ Polaris claims these findings were based on 4,641 cases reported over the course of approximately nine years.

Illicit Massage, Health, & Beauty

Ms. Carr then goes on to discuss trafficking within illicit massage, health, & beauty industries as follows:

In this typology, a façade of legitimacy for massage, health, and beauty services conceals that “...their primary business is the sex and labor trafficking of women trapped in these businesses.” The trafficker profile for these cases includes on-site managers which “...tend to be women of the same ethnicity and may have been trafficked themselves in these businesses before becoming part of the larger trafficking network.” To control the victims in these cases, they may be forced to live on-site and have their movement monitored.¹⁹¹

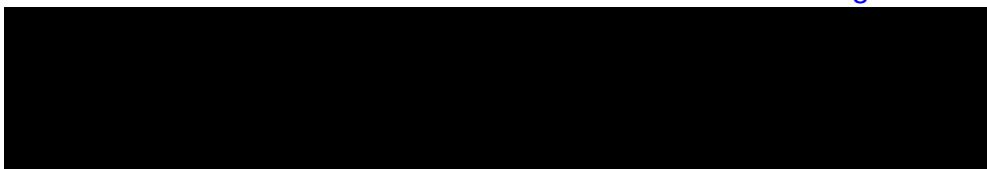
Again, although Ms. Carr claims that Epstein’s behavior also fits into this human trafficking typology, she provides no reference to any citation for this assessment. Sex trafficking in the illicit massage, health, & beauty industries, as referenced in the cited Polaris report, is referring to commercial sex acts that occur in “single storefronts” under the façade of legitimate spa services. Epstein’s victims do not affirmatively allege that they provided commercial sex services while trapped working in a single storefront. Moreover, in applying the “methods of control,” as identified by Polaris, to the present matter, the facts of the current case were predominately atypical from the cases reported to the hotline regarding trafficking in the illicit massage, health, & beauty industry (see Table 10).

Table 10: Polaris Methods of Control in Illicit massage, Health, & Beauty Industries¹⁹² versus Allegations Against Epstein.

Method of Control	Application to the Present Matter
Extreme intimidation	Not alleged
Threats of shame	Not alleged
Isolation from the outside community	Not alleged
Debt bondage	Not alleged
Exploitation of communication barriers	Not alleged
Explicit threats	Not alleged
Implied threats	Not alleged in a manner that is typical of trafficking
Forced to live at the business	Not alleged
Controlled movement between work and home	Not alleged
Day-to-day actions monitored in-person or off-site with a CCTV camera	Not alleged

¹⁹¹ Carr Report, ¶ 35c.

¹⁹² Polaris claims these findings were based on 2,949 cases reported over the course of approximately nine years.



Arts and Entertainment

Ms. Carr then goes on to discuss trafficking within the arts and entertainment industries as follows:

This typology includes a number of industries; however, for this case, I focused on modeling. “In the modeling industry, foreign and U.S. citizen women can be fraudulently recruited...with exaggerated job offers and fake immigration benefits.” Traffickers may be “recruiters and executives in model management companies” and they may control victims through sexual abuse and harassment.¹⁹³

Again, although Ms. Carr claims that Epstein’s behavior also fits into this human trafficking typology, she provides no reference to any citation for this assessment. **Labor** trafficking in the arts and entertainment industries, as referenced in the cited Polaris report, is referring to labor trafficking in exotic dancing, with no accompanying sex act, or in a variety of sectors of the arts and entertainment industry, including modeling, athletics, and less commonly performing arts such as acting, choirs, and dance troupes. Moreover, in applying the “methods of control,” as identified by Polaris, to the present matter, the facts of the current case were predominately atypical from the cases reported to the hotline regarding trafficking in the arts and entertainment industries (see Table 11).

Table 11: Polaris Methods of Control in Arts and Entertainment Industries¹⁹⁴ versus Allegations Against Epstein.

Method of Control	Application to the Present matter
Sexual abuse and harassment	Not alleged in a manner that is typical of trafficking
Not paid	Not alleged
Charged exorbitant fees for crowded housing	Not alleged
Excessive practice and/or exercise routines	Not alleged
Exhaustion	Not alleged
Limited access to food	Not alleged
Limited access to hygiene	Not alleged
Wage confiscation	Not alleged
High fees	Not alleged
Emotional abuse	Not alleged in a manner that is typical of trafficking
Psychological manipulation	Not alleged in a manner that is typical of trafficking

Personal Sexual Servitude

Finally, Ms. Carr discusses personal sexual servitude trafficking as follows:

¹⁹³ Carr Report, ¶ 35d.

¹⁹⁴ Polaris claims these findings were based on only 102 cases reported over the course of approximately nine years.

[REDACTED]

In this typology, payment is not always cash and the “line between ongoing sexual abuse and personal sexual servitude is complex.” Trafficker profiles and recruitment vary, although victims “may be ‘sold’ by a family member to a trafficker.” Traffickers use multiple forms of control including ongoing sexual assaults, threats, and isolation.¹⁹⁵

Again, although Ms. Carr claims that Epstein’s behavior also fits into this human trafficking typology, she provides no reference to any citation for this assessment. Personal sexual servitude, as referenced in the cited Polaris report, can occur when a woman or girl is permanently sold, often by her family to settle a drug debt, to an individual buyer for the explicit purpose of engaging in periodic sex acts over a long period of time. It can also occur within a commercial non-consenting marriage situation, primarily involving adult foreign national women. Moreover, in applying the “methods of control,” as identified by Polaris, to the present matter, the facts of the current case were predominately atypical from the cases reported to the hotline regarding personal sexual servitude trafficking (see Table 12).

Table 12: Polaris Methods of Control in Personal Sexual Servitude Trafficking¹⁹⁶ versus Allegations Against Epstein.

Method of Control	Application to the Present Matter
Sexual assaults	Not alleged in a manner that is typical of trafficking
Physical abuse	Not alleged in a manner that is typical of trafficking
Confinement	Not alleged
Isolation	Not alleged
Threats	Not alleged in a manner that is typical of trafficking
Substance abuse	Not alleged
Withholding of food	Not alleged
Withholding of shelter	Not alleged
Drugs as forms of abuse or punishment	Not alleged

Ultimately, it appears as though Ms. Carr has repeatedly curated information in an attempt to match the facts of the present matter. Overwhelmingly, using Ms. Carr’s own citations, the methods of control alleged in the present matter are remarkably different from the methods of control reported to the Polaris hotline. Moreover, even though there are a few allegations that may ostensibly fit within these trends, this should be interpreted cautiously. In fact, Ms. Carr goes on to note that protocols and indicators for human trafficking typically include caveats about the limitations, which is absolutely correct. Ms. Carr acknowledges that:

1. The presence or absence of indicators is not definitive proof of human trafficking;
2. Not all indicators are present in every human trafficking situation;

¹⁹⁵ Carr Report, ¶ 35e.

¹⁹⁶ Polaris claims these findings were based on only 405 cases reported over the course of approximately nine years.

- 
3. These lists are not exhaustive; and
 4. No single indicator, by itself, is conclusive of trafficking.

Here, I agree with each of the four caveats listed by Ms. Carr, but after acknowledging these appropriate limitations, Ms. Carr claims, “there is one indicator which, if present, unequivocally meets the federal definition of sex trafficking: if a minor is involved in a commercial sex act.” Although all minors involved in the commercial sex industry **should** be treated as persons in need of social services, not all minors involved in the commercial sex industry are trafficked—some minors engage in survival sex and some minors are not *induced*, but rather engage in commercial sex for money. If Ms. Carr were correct, children would not continue to be criminalized for commercial sex acts. For examples, see the cases of *In re. N.C.*,¹⁹⁷ *In re. M.V.*,¹⁹⁸ *In re. M.D.*,¹⁹⁹ and *In re. Aarica S.*²⁰⁰ Additionally, according to the Office of Juvenile Justice and Delinquency Prevention, in 2018 there were 260 children under the age of 18 arrested for prostitution and/or commercialized vice, 50 of whom were under the age of 15.²⁰¹

Finally, in attempt to support her Opinion C, Ms. Carr cites to three sets of “human trafficking indicators” from:

- (1) Department of Homeland Security;
- (2) Department of State; and
- (3) Department of Health and Human Services, Administration for Children and Families.

Ms. Carr provides absolutely no reference to the basis of these indicators, the methodology used in their development, their sensitivity or specificity, or the venue for which these are most appropriately applied. Moreover, Ms. Carr offers no explanation for why these three sets indicators were referenced, other than claiming they were a “sampling” of “typical indicator lists under United States law” and were “representative” of the types of indicators relied upon by “experts within the field.” Ms. Carr does not state the sampling frame from which she selected these indicator sets and fails to provide the sampling criteria to elucidate on the selection. However, it should be noted that none of the “human trafficking indicator” sources selected by Ms. Carr are named as a “comprehensive” human trafficking screening tool, identified by the Urban Institute in 2017²⁰² (see Figure 12). However, the Operational Indicators of Trafficking in Human Beings, published by the International Labor Office in September of 2009 is listed as one of the first, if not the first, comprehensive human trafficking screening tool. It is also one of the few sets of indicators that was developed and tested through a research methodology. As such, it is commonly used by experts in application to civil trafficking cases internationally and in the United States.

¹⁹⁷ *In re N.C.*, 4 Cal. App. 5th 1235 (Cal. Ct. App. 2016).

¹⁹⁸ *In re M.V.*, 225 Cal.App.4th 1495 (Cal. Ct. App. Jul. 27, 2012).

¹⁹⁹ *In re M.D.*, 231 Cal. App. 4th 993 (Cal. Ct. App. 2014).

²⁰⁰ *In re Aarica S.*, 223 Cal. App. 4th 1480 (Cal. Ct. App. 2014).

²⁰¹ OJJDP. *Estimated number of arrests by offense and age group, 2018*.

https://www.ojjdp.gov/ojstatbb/crime/ucr.asp?table_in=1.

²⁰² Meredith L. Dank, et al., *Pretesting a human trafficking screening tool in the child welfare and runaway and homeless youth systems*. New York, NY: Urban Institute, 2017.

Comprehensive Human Trafficking

Tool	Creator	Year
Department of Children and Families Human Trafficking Nursing Toolkit	Connecticut Department of Children and Families	n.d.
Model Canadian Screening Tool to Help Identify a Potential Victim of Human Trafficking	Department of Justice Canada	n.d.
Human Trafficking Identification: Screening Tool and Report	Indiana Protection for Abused and Trafficked Humans Task Force	n.d.
Operational Indicators of Trafficking in Human Beings	International Labour Organization	2009
Screening Tool for Human Trafficking Victims	Kentucky Rescue and Restore Coalition	2010
Standardized Screening Trafficking Questions	Ohio Human Trafficking Task Force	2013
Screening Protocol Tailored for the Ohio Department of Rehabilitation and Corrections (DRC) and the Ohio Department of Youth Services (DYS) A	Ohio Human Trafficking Task Force	2013
Screening Protocol Tailored for the Ohio Department of Rehabilitation and Corrections (DRC) and the Ohio Department of Youth Services (DYS) B	Ohio Human Trafficking Task Force	2013
Comprehensive Human Trafficking Assessment Tool	Polaris Project	2011
Human Trafficking Assessment for Medical Professionals	Polaris Project	2010
Human Trafficking Assessment for Domestic Violence and Sexual Assault Programs	Polaris Project	2011
Human Trafficking Assessment for Airlines and Airports	Polaris Project	2011
Human Trafficking Assessment Tool for Domestic Violence Programs	Polaris Project	2011
Human Trafficking Assessment Tool for Educators	Polaris Project	2011
Human Trafficking Incident Report	Toledo-Lucas County Department of Health	n.d.
Screening Tool for Victims of Human Trafficking for Law Enforcement	US Department of Health and Human Services, Administration for Children, Youth and Families (ACYF)	n.d.
Screening Tool for Victims of Human Trafficking for Health Care Providers	U.S. Department of Health and Human Services, ACYF	n.d.
How to Identify a Human Trafficking Victim	United States Conference of Catholic Bishops	2014
Trafficking Victim Identification Tool (TVIT)	Vera Institute for Justice	2014

Figure 12: Comprehensive Screening Tools Identified by the Urban Institute

Ultimately, the sets of indicia included on page 11-13 of Ms. Carr's report have a questionable evidence base and many are hypothesized to have low rates of sensitivity and specificity. However, even when using the indicators sets selected by Ms. Carr, the overwhelming majority of indicia are absent from the present case (see Table 13).

Table 13: Indicators Referenced by Carr, by Agency, and Applied to the Present Case

Purported Indicator	Agency	Application to the Present Matter
Does the person appear disconnected from family, friends, community organizations, or houses of worship?	Department of Homeland Security	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. In



Purported Indicator	Agency	Application to the Present Matter
		fact, the alleged victims were frequently connected with family, friends, etc.
Has a child stopped attending school?	Department of Homeland Security	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. In fact, the alleged victims continued attending school.
Has the person had a sudden or dramatic change in behavior?	Department of Homeland Security	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Is a juvenile engaged in commercial sex acts? / Under 18 in prostitution	Department of Homeland Security & Department of State	Alleged, but is unclear of whether the sexual abuse of minors in these instances meet the definition of a commercial sex act, considering that the money paid was associated with massages, referrals, or silence, not sexual acts. Although, according to the legal interpretation of the federal statute, all juveniles engaged in commercial sex acts are not trafficked, they are at high risk and should be treated as persons in need of services.
Is the person disoriented or confused, or showing signs of mental or physical abuse? / Is unsure of day, date, month, year / Doesn't know where they live.	Department of Homeland Security & Department of HHS ²⁰³	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Does the person have bruises in various stages of healing? / Signs of physical abuse / Physical abuse	Department of Homeland Security & Department of State & Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Is the person fearful, timid, or submissive? / Submissive or fearful / Seems afraid to answer questions.	Department of Homeland Security & Department of State & Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Does the person show signs of having been denied food, water, sleep, or medical care?	Department of Homeland Security	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Is the person often in the company of someone to whom he or she defers? Or someone who seems to be in control of the situation, e.g., where they go or who they talk to? / Is with a person who speaks for them.	Department of Homeland Security & Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Does the person appear to be coached on what to say? / Answers appear to be scripted and rehearsed / Story doesn't make sense; seems scripted.	Department of Homeland Security & Department of State & Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.

²⁰³ Department of Health and Human Services, Administration for Children and Families Office.

Purported Indicator	Agency	Application to the Present Matter
Is the person living in unsuitable conditions? / Poor living conditions.	Department of Homeland Security & Department of State	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Does the person lack personal possessions and appear not to have a stable living situation? / Moves frequently / Wears the same clothes over and over.	Department of Homeland Security & Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Does the person have freedom of movement? Can the person freely leave where they live? Are there unreasonable security measures? / Not allowed to come and go at will/ Can't move freely; attached to someone.	Department of Homeland Security & Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Living with Employer / Odd living/work space (may include tinted windows, security cameras, barbed wire, people sleeping/living at worksite)	Department of State & Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Multiple people in cramped space.	Department of State	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Inability to speak to individual alone.	Department of State	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Employer is holding identity documents / Not in control of personal, identification.	Department of State & Department of State	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. In fact, the alleged victims often had control over their personal identification and identity documents, such as passports. ²⁰⁴
Unpaid or paid very little / Someone else controls their money.	Department of State & Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. In fact, the alleged victims were paid large sums of money.
Owes a debt to employer.	Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. In fact, the alleged victims were paid large sums of money.
Works long hours; exhausted; hungry / malnourished	Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case.
Works in the commercial sex industry: escort, exotic dancer, "prostitute," "massage"	Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. Moreover, the majority of persons who work in the commercial sex industry as escorts,

²⁰⁴ See, e.g., ESTATE_JPM018238 (noting domestic and overseas commercial flights for [REDACTED]).

Purported Indicator	Agency	Application to the Present Matter
		exotic dancers, erotic masseuses, or prostitutes are not trafficked.
Signs of having sex with multiple people	Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. Moreover, the majority of persons who have sex with multiple partners are not trafficked.
Has pimp: male, female, boyfriend, husband	Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. Moreover, the majority of persons who have a boyfriend or husband are not trafficked.
Tattoos or branding of ownership	Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. Moreover, the majority of persons who have tattoos are not trafficked.
Uses language of the sex industry	Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. Moreover, the majority of persons who work in the commercial sex industry as escorts, exotic dancers, erotic masseuses, or prostitutes are not trafficked. Therefore, the majority of persons who “use language of the sex industry” are not trafficked.
Inappropriate clothing for venue or weather	Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. Moreover, the operationalization of this purported indicia is subjective as far as what is considered “inappropriate.”
Drugs/alcohol	Department of HHS	No indication of JPMC being made aware of this purported indicator during the alleged victimization period in the present case. Moreover, the overwhelming majority of the persons who use drugs and/or alcohol are not trafficked.

That said, if Ms. Carr had performed even a cursory review on the evidence-base of the indicator sources that she cites, she would know that the Department of Homeland Security indicators are not based on any empirical research. Rather, these purported “indicia” were developed through unscientific reference to anecdote from working groups.²⁰⁵ Although these indicia were recently

²⁰⁵ I personally interviewed Mick McKeown, who was Executive Director of the Homeland Security Advisory Council and Campaign Office during the time this toolkit was created, and he confirmed absolutely no research was used in the development of these indicators or to test their sensitivity or specificity for identifying potential trafficking.

[REDACTED]

tested to assess trainee retention of information,²⁰⁶ their efficacy, sensitivity, and specificity are still unknown, but are hypothesized to be low, due to documented issues related to misidentification, as discussed in greater detail in *Supra* Section V.

Carr Opinion D: Jeffrey Epstein Directed A Sex Trafficking Venture.

Despite the demonstrable limitations of the indicia that she attempts to rely upon, Ms. Carr makes the legal conclusion that “Jeffrey Epstein directed a sex trafficking venture,” citing to:

1. A reference to the grand jury findings from 2019, where Epstein was indicted for trafficking six years after the end of his business relationship with JPMC; and
2. A reference to the media article, where JPMC acknowledge that the 2019 indictment exposed a reality about Epstein, which they (and the rest of the American public) were not fully aware of during the business relationship, which nevertheless ended six years earlier.

JPMC do not contest that Epstein was a sexual predator, who was indicted for sex trafficking in 2019. However, a reliable analysis on his crimes will conclude that his sexual predilections are atypical of trafficking cases. Moreover, the public, including JPMC, were not made aware of the extent of his abuses until his indictment in 2019. Allegations alone are not actionable for most third-parties, which is why there is a reliance on law enforcement to properly investigate and intervene when and if allegations are brought to their attention.

Unfortunately, law enforcement repeatedly failed to adequately intervene; thus, delaying interventions by third parties. In fact, officers of the court were alleged to have deliberately withheld information, even from victims.²⁰⁷

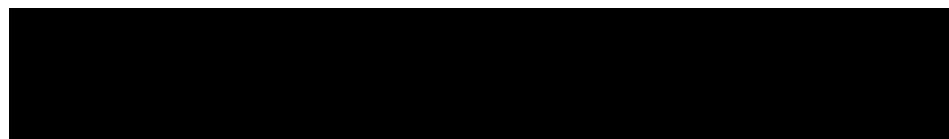
Nevertheless, Ms. Carr incredulously claims that Epstein’s behaviors were “textbook human trafficking” because “the power and control” Epstein “exerted over his victims” was “consistent with both the academic literature on sex trafficking” and other “sex trafficking ventures” that Ms. Carr claims to have analyzed in her casework.²⁰⁸ These statements are made without citation to any academic source and are made without reconciling the differences between the present allegations and the overwhelming majority of trafficking cases (e.g., which typically involve a lack of payment and/or debt).

Instead of relying upon state of the science research, Ms. Carr claims that her opinion is supported by Epstein’s 2019 indictment and Ghislaine Maxwell’s 2022 conviction for what Ms. Carr repeatedly terms “abuse.”

²⁰⁶ E. Savoia et al., *A Quasi-Experimental Intervention Trial to Test the Efficacy of a Human Trafficking Awareness Campaign: The Blue Campaign*, Journal of Human Trafficking 1-20 (2023).. Note: I served as a peer reviewer on this article.

²⁰⁷ For example, in 2009, Brad Edwards filed suit on behalf of clients regarding the failure of the federal government to provide them information under the Crime Victims Rights Act. OPR Report, ii.

²⁰⁸ Carr Report, ¶ 40.



Again, although Ms. Carr claims that Epstein directed a “textbook human trafficking” venture, she fails to cite to a single case or academic source which is comparable.

Instead, Ms. Carr simply cites to a curated selection of facts to support the contention that:

1. Epstein engaged in commercial sex with girls under the age of 18; and
2. Epstein used fraud, force, and/or coercion to induce girls and young women to perform commercial sex acts.

In this section, it is important to first acknowledge that Ms. Carr discounts the fact that the discovery of the extent of the allegations against Epstein and Maxwell came in 2019, six years after the end of the business relationship. To this effect, Ms. Carr fails to properly address the impact of confirmation bias and/or hindsight bias as significant limitations to her opinions (see *Supra* Section II).

Ms. Carr claims that the Palm Beach Police Department’s investigation into Epstein in 2006, “provides evidence of a pattern consistent with a sex trafficking venture.”²⁰⁹ This opinion is most certainly impacted by confirmation bias and/or hindsight bias, considering the fact that the Palm Beach Police failed to indict Epstein for trafficking crimes at the time. Ms. Carr further completely ignored the language in the police report, which predominately accused Epstein of “molestation” or “sexual battery”, not trafficking. Ms. Carr also ignores the implication of the fact that Palm Beach charged Epstein with “unlawful sex with a minor,” but he was eventually indicted for and convicted of “procuring for prostitution a girl below age 18.”

Yet, even though (1) Palm Beach police did not charge Epstein with trafficking in 2006; (2) Palm Beach prosecutors did not charge Epstein with trafficking in 2006; (3) The Grand Jury did not indict Epstein for trafficking in 2006; and (4) Epstein was not convicted for trafficking in 2006,²¹⁰ Ms. Carr claims that the incident report “provides evidence” of a pattern consistent with a sex trafficking venture.²¹¹

Ms. Carr failed to cite to any testimony, fact, evidence, literature, or case law that would suggest that these allegations are ostensibly consistent with trafficking. Instead, Ms. Carr’s interpretation relies heavily upon the **non-prosecution** agreement²¹² that Epstein signed on December 7, 2007²¹³ and was made public on September 18, 2009,²¹⁴ which states that there was a federal **investigation** into offenses that may have been committed by Epstein from 2001 through approximately September 2007. This **investigation** included multiple offenses regarding illicit

²⁰⁹ Carr Report, ¶ 43 (citing JDoe_DBAG_005374 (“2006 PBPD Incident Report”)).

²¹⁰ As acknowledged by Ms. Carr, On July 19, 2006, following the Palm Beach Police Department’s investigation, Epstein was indicted for Felony Solicitation of Prostitution in the Fifteenth Judicial Circuit in Florida JDoe_JPMC_004535 at 42.

²¹¹ Note: I contest the notion that a police report “provides” evidence, as described by Ms. Carr.

²¹² JDoe_DBAG_005165 (“Non-Prosecution Agreement” or “NPA”).

²¹³ For example, see Carr Report ¶ 46.

²¹⁴ See OPR Report 240.

[REDACTED]

sexual conduct involving minors and an investigation into sex trafficking; however, Epstein was not ultimately indicted or convicted for these alleged offenses.

The comparable cases of Charlie Chaplin, Jack Johnson, and Eleanor Williams, as discussed in *Supra* Section VII, is an example of why allegations alone should not be actionable.

Prior to 2019, although Epstein's crimes were not apparently consistent with trafficking, he was not indicted for trafficking, he was not convicted of trafficking, and there is no reliable empirical basis or fact evidence to conclude that Epstein was engaged in trafficking, Ms. Carr proffers the legal conclusion that Jeffrey Epstein directed a sex trafficking venture. Ms. Carr attempts to support this conclusion by stating that:

1. Jeffrey Epstein engaged in commercial sex with girls under the age of 18; and
2. Jeffrey Epstein used fraud, force, and/or coercion to induce girls and young women to perform commercial sex acts.²¹⁵

Ms. Carr's first basis of support for Opinion D is founded in the unsubstantiated notion that commercial sex with girls with minors was *de facto* considered trafficking in 2008, which is not accurate, as discussed in *Supra* Section V. As referenced by Ms. Carr, the distinction between the "prostitution" of minors, sex trafficking, and sexual abuse was not reconciled until a year *after* the JPMC Defendants chose to end their business relationship with Mr. Epstein. Specifically, Ms. Carr writes:

*At the time of Epstein's charge, "Procuring a Person under 18 for Prostitution" was defined as: "A person who procures for prostitution, or causes to be prostituted, any person who is under the age of 18 years commits a felony of the second degree." This law was repealed in 2014 by Fla. HB 989, which was "an act relating to human trafficking."*²¹⁶

Regardless, and even assuming Ms. Carr is correct in her interpretation of the statute, the point is moot, considering this change did not occur until *after* the end of the JPMC business relationship with Epstein. Moreover, as previously stated, the present allegations should not be evaluated through the lens of hindsight bias.

While Ms. Carr presently claims that Epstein's guilty plea to "Procuring a Person under 18 for Prostitution" in 2008 satisfies the definition of sex trafficking under the TVPA (i.e., solicits commercial sex with a person under the age of 18), she is mistaken, especially considering the prevailing interpretation of the law prior to 2014. In 2014, even officers of the court who portrayed themselves as anti-trafficking advocates, such as former California Attorney General and current Vice Present Kamala Harris, did not interpret the TVPA to mean that minors

²¹⁵ Carr Report Pages 14 and 17.

²¹⁶ Carr Report, ¶ 50.

[REDACTED]

involved in the commercial sex industry are *de facto* victims of sex trafficking.²¹⁷ Even as recent as 2020, children are still being arrested and charged for trafficking crimes, which further undermines the reliability of Ms. Carr's interpretation. However, this is a common misconception made by persons without an in-depth and specialized expertise in the field, which explains why JPMorgan's General Counsel from January 2007 until roughly the end of 2015, acknowledged that solicitation of someone under the age of 18 for commercial sex is a criminal act under the TVPA.²¹⁸

Ms. Carr's second basis of support for Opinion D is founded in nothing more than a credibility determination.²¹⁹ Instead of citing to any reliable literature or comparable cases, Ms. Carr spends nearly ten pages of her report restating allegations made by various alleged victims (some of whom are accused by others as co-conspirators²²⁰). Interestingly, Ms. Carr omits the fact that Mr. Epstein's co-conspirator, Ghislaine Maxwell, was convicted of one substantive count of sex trafficking related to one individual—[REDACTED], *not* the others referenced in this section of Ms. Carr's report.²²¹ For example, Ms. Carr provides a statement from [REDACTED] [REDACTED] as an example of how she claims Jeffrey Epstein used "force, fraud, and/or coercion to induce girls and young women to perform commercial sex acts."²²² Specifically, Ms. Carr writes:

[REDACTED] said, "*When I was recruited by Ghislaine Maxwell at Mar-a-Lago, just before I was 17, I thought I was given a big break, and I'd be able to reset my life and become an actual real massage therapist. My hopes were quickly dashed, and my dreams were stolen.*"²²³

However, Ghislaine Maxwell was not indicted or convicted for trafficking [REDACTED]—a fact Ms. Carr wholly ignores. Additionally, Ms. Carr completely fails to provide any discussion on the criminological trend of compensated trafficking victims being conceptualized and prosecuted as co-conspirators in criminal court.

Instead of relying upon evidence-based information, Ms. Carr's opinions appear to be severely skewed by confirmation bias. For example, in Ms. Carr's "conversation" (not a qualitative or "trauma informed" interview) with [REDACTED] (a woman who was previously accused by law enforcement of being a co-conspirator), Ms. Carr incredulously claims (without citation) that "many of the women to whom Epstein made payments have Eastern European surnames,

²¹⁷ See, for example, *In re Aarica S.*, 223 Cal. App. 4th 1480 (Cal. Ct. App. 2014).

²¹⁸ Carr Report, ¶ 52, citing Stephen Cutler Dep. (May 24, 2023) at 21:12-20; 90:7-93:4.

²¹⁹ See, for example, Carr Report ¶ 56.

²²⁰ For example, [REDACTED]

²²¹ One of the five counts of which the jury convicted Ghislaine Maxwell was count six, *see* Transcript of Record at 3176:5, *United States v. Maxwell*, 20-cr-00330-AJN (S.D.N.Y. Dec. 29, 2021), i.e., sex trafficking of an individual under the age of 18 ("[REDACTED] only"). Verdict Sheet at 2, *United States v. Maxwell*, 20-cr-00330-AJN (S.D.N.Y. Dec. 19, 2021), ECF No. 565. The witness who testified as "[REDACTED]" in *United States v. Maxwell* later self-identified as [REDACTED]. *See* Briquet, Kate, *Ghislaine Maxwell Sentenced to 20 Years For Sex Trafficking Girls to Jeffrey Epstein* (June 28, 2022), Daily Beast. Retrieved from: <https://www.thedailybeast.com/ghislaine-maxwell-jeffrey-epsteins-socialite-girlfriend-turned-sex-trafficker-sentenced-to-20-years>).

²²² Carr Report, ¶ 57b.

²²³ Carr Report, ¶ 57b.

suggesting they may also be immigrants.” Ms. Carr then goes on to say it is “well known” that “Eastern Europe is a source country for human trafficking victims.”²²⁴ The indications of bias in Ms. Carr’s quantum leaps of logic include, but are not limited to:

1. Making the speculative assumption of what constitutes an “Eastern European” surname;
2. Making the speculative assumption that a person with a purported “Eastern European” surname is an immigrant;
3. Making the erroneous assertion that Eastern Europe is a major source country for human trafficking victims in the United States; and
4. Suggesting that JPMorgan knew that Eastern Europe is a source country for human trafficking victims and somehow could have intervened on the basis of these assumptions.

In an attempt to support these erroneous assumptions, Ms. Carr cites to the 2009 Trafficking in Persons Report, published by the U.S. Department of State. I found this interesting, considering that there was not a country narrative on the United States in this report in 2009.²²⁵ A country narrative on the United States was not added to the Trafficking in Persons (TIP) Report until 2010. *If* Ms. Carr had read the 2010 TIP Report’s country profile on the United States, she would know that there is no mention of “Eastern Europe” being a source country to America.²²⁶ Instead, the 2010 TIP report found that primary countries of origin for foreign victims certified by the U.S. government were “Thailand, Mexico, Philippines, Haiti, India, Guatemala, and the Dominican Republic.”

With that being said, although there was no United States specific information in the 2009, it should be noted that JPMC nevertheless accurately cited the document for the general information it provides, such as definitions and trafficking typologies.²²⁷

Ultimately, Ms. Carr goes on to make numerous conclusory statements based on nothing more credibility determinations, confirmation bias, and unsupported speculation or subjective belief (for example, see Table 14).

Table 14. Summary of Carr’s Opinions, Basis, and Countervailing Information

Carr’s Statement	Basis	Sample of Countervailing Information ²²⁸
Epstein or others acting under his direction recruited economically	Statements from Jane Doe 5, [REDACTED] “a Jane Doe,” “another	Ms. Carr omits the fact that: 1. [REDACTED] is accused by [REDACTED] of being a co-conspirator. 2. [REDACTED] was accused of being a co-conspirator by law enforcement.

²²⁴ Carr Report, ¶ 58.

²²⁵ Trafficking in Persons Report U.S. Dep’t of State (2009), <https://2009-2017.state.gov/j/tip/rls/tiprpt/2009/index.htm>.

²²⁶ Trafficking in Persons Report U.S. Dep’t of State (2010), <https://2009-2017.state.gov/j/tip/rls/tiprpt/2010/142761.htm>.

²²⁷ JPM-SDNYLIT-00174047

²²⁸ Additional examples can be provided during deposition and/or in a supplement.

Carr's Statement	Basis	Sample of Countervailing Information ²²⁸
vulnerable girls and young women for commercial sex under the false pretense of receiving payment for providing a massage.	Jane Doe, M.J., Jane Doe 2, [REDACTED] and [REDACTED]	<p>3. None of these women or girls were determined to be trafficked by Ghislaine Maxwell.</p> <p>4. These individuals did receive the payments they were promised for providing massages, which is not a false pretense.</p> <p>Ms. Carr relies on nothing more than a credibility assessment of the alleged victims.</p>
Many of the young girls and women experienced violence, threats of violence, or otherwise feared serious harm would occur if they did not do what Epstein wanted.	Statements from [REDACTED], C.D., "A Jane Doe", and M.J.	<p>Ms. Carr omits the fact that:</p> <ol style="list-style-type: none"> 1. [REDACTED] is accused by [REDACTED] of being a co-conspirator. 2. None of these women or girls were determined to be trafficked by Ghislaine Maxwell. 3. Trafficking situations can involve violence, threats, and harm for the purpose of exploitation, where an individual is induced into modern slavery, which is not consistent with the totality of the circumstances of these individuals. <p>Again here, Ms. Carr relies on nothing more than a credibility assessment of the alleged victims.</p>
In some cases, Epstein would coerce young girls and women into commercial sex by making them believe he cared about them.	Statements from [REDACTED] C.D., T.D., and [REDACTED]	<p>Ms. Carr omits the fact that:</p> <ol style="list-style-type: none"> 1. The term coercion has a very specific meaning regarding trafficking claims. It should not be interpreted as a synonym for "convincing" or "persuading", which is how Ms. Carr appears to be using it in her report.²²⁹ 2. [REDACTED] is accused by [REDACTED] of being a co-conspirator. 3. None of these women or girls were determined to be trafficked by Ghislaine Maxwell. <p>Again here, Ms. Carr relies on nothing more than a credibility assessment of the alleged victims.</p>
Epstein coerced his victims into commercial sex by establishing control over their lives and emotionally manipulating them.	Statements from [REDACTED] and [REDACTED]	<p>Ms. Carr omits the fact that:</p> <ol style="list-style-type: none"> 1. The term coercion has a very specific meaning regarding trafficking claims. It should not be interpreted as a synonym for "convincing" or "persuading", which is how Ms. Carr appears to be using it in her report²³⁰. 2. [REDACTED] is accused by [REDACTED] of being a co-conspirator. 3. [REDACTED] was accused of being a co-conspirator by law enforcement. 4. None of these women or girls were determined to be trafficked by Ghislaine Maxwell. 5. Ms. Carr ignores countervailing evidence to the statements. For example, that Epstein told his alleged victims what to wear and how to cut, color, and style their hair. Emails illustrate that alleged victims would ask Epstein's advice on these stylistic choices, for money and appointments to

²²⁹ See *Supra* Section II.

²³⁰ *Id.*

Carr's Statement	Basis	Sample of Countervailing Information ²²⁸
		<p>effectuate them, and would solicit praise after their completion.²³¹</p> <p>Again here, Ms. Carr relies on nothing more than a credibility assessment of the alleged victims.</p>
Epstein coerced his victims into commercial sex by confiscating their passports	Statements from [REDACTED] ²³²	<p>Ms. Carr omits the fact that:</p> <ol style="list-style-type: none"> 1. [REDACTED] is accused by [REDACTED] of being a co-conspirator. 2. Ms. Carr ignores countervailing evidence to the statements. For example, that [REDACTED] repeatedly asked to visit Epstein and that she used her identification documents to travel on other occasions.²³³ 3. This claim is not corroborated by others. <p>Again here, Ms. Carr relies on nothing more than a credibility assessment of a small segment of alleged victims.</p>
Payment of cash and other types of financial support for sexual acts is consistent with the definition of inducing a commercial sex act under the TVPA.	Statements from alleged victims that: <ol style="list-style-type: none"> 1. Epstein said the more “you do the more you are paid”. 2. They were paid \$200-\$300 dollars for a single massage session. 3. Epstein paid for [REDACTED]’s rent, dance classes, haircuts, which she was expected to repay. 4. [REDACTED] was told that she had the option to be paid \$100 to give Epstein a massage with 	<p>First, and most importantly, Ms. Carr’s erroneous interpretation of the TVPA demonstrably conflates purported indicia of sex trafficking with possible indicia of commercial sex. Specifically, it is a known fact that payment for commercial sex is correlated with the type of sexual services provided. As a result, some consenting sex workers may consent to sexual activities that they would otherwise decline solely on the basis of payment.²³⁴</p> <p>Second, Ms. Carr cites to absolutely no reliable cases, research, or evidence to suggest that these payments are consistent with trafficking. In fact, the absence of payments or lower payments are typical of potential trafficking, especially in the erotic massage industry. Unlike trafficking victims, these individuals were compensated consistent with the amount that was promised (e.g., \$200-\$300 dollars for a single massage session). Moreover, I am not aware of any trafficking case where a victim was compensated with over \$1,000 for a single trip, much less over \$10,000, as evidenced in the present matter. However, it should be noted that recently some courts have started to expand the traditional interpretation of trafficking law with trafficking cases involving some payment to minor victims²³⁵, but that is still atypical of most trafficking claims and arguably inconsistent with the congressional intent for the TVPA. More importantly, that was not the understanding during the alleged victimization period in the present matter.</p> <p>Third, Ms. Carr’s citation of [REDACTED] constant borrowing is inconsistent with the facts in evidence. Epstein paid for [REDACTED] [REDACTED] rent, dance classes, haircuts, because she repeatedly asked him to.²³⁶ She was expected to repay, because she affirmatively</p>

²³¹ ESTATE_JPM005030; ESTATE_JPM005031; ESTATE_JPM005032

²³² Carr Report, ¶ 63.

²³³ ESTATE_JPM 005212; ESTATE_JPM004928-4934; ESTATE_JPM004935-4937; ESTATE_JPM 004788.

²³⁴ See, for example, the trial transcript of *United States v. Mei Xing*, No. 2:20-CR-0228(A)-FMO (C.D. Cal.).

²³⁵ For example, see *United States v. Anton Joseph Lazzaro*. <https://www.justice.gov/usao-mn/press-release/file/1424071/download>.

²³⁶ For examples, see ESTATE_JPM005389, “I wanted to know if it would be ok to get a LIRR Card for the next two wks...I don’t have enough to get there.”

Carr's Statement	Basis	Sample of Countervailing Information ²²⁸
	her clothes on or \$300 to give a massage with her clothes off. 5. After Epstein had sex with [REDACTED] and her sister [REDACTED] on a trip to the U.S. Virgin Island, Epstein sent them a \$11,000 wire payment.	chose to borrow the money. ²³⁷ This is not consistent with victims of trafficking, who are forced under threat or coercion to repay debts that they did not agree to or were deceived about.

ESTATE_JPM005422, “my roommate is losing her un employment and now she has to charge 900 for my room...I wanted to know if you can pay 300 just til I’m done with school.”;

ESTATE_JPM005251, [REDACTED] is wondering if she could pick up \$100 tomorrow to hold her spot for school.”; ESTATE_JPM005290, “[REDACTED]...is asking if it would be ok to pick up money for books...Ok for her to pick up \$500 (more? Less?)”;

ESTATE_JPM005380, “[REDACTED] just texted me you said it was okay for me to buy her point shoes...I know we spent close to \$500 with [REDACTED] do the same for [REDACTED]?”

ESTATE_JPM005336, “[REDACTED] would like to stop by and pu (sic) some money today. Pls advise how much to give.”

ESTATE_JPM005353, “[REDACTED] is asking if she could purchase a dance card.”

ESTATE_JPM005356, “[REDACTED]...is wondering if she could pick up some money for (shiatsu and Thai massage as part of her midterm project.”

ESTATE_JPM005103, “[REDACTED] is asking if she could possibly pick up her final tuition check for \$7072. She is on her way to pick up her money for the island now.”

ESTATE_JPM005104, “[REDACTED] is asking if you could help pay for her last semester. She needs 2 check to take the NYS license exam.”

²³⁷ For examples, see ESTATE_JPM005198, “I wanted to as a favor. I have to pay 600 a month which I can afford, but I don’t have 1st and last months rent to get started...If I could borrow it I can pay you back when I start the job.... Love and miss you, [REDACTED];”

ESTATE_JPM005218, “I have no way to pay my phone bill and its going on being 2 months late :(would it be all right if I borrowed some money to pay it till I find a job?”;

ESTATE_JPM005327, “[REDACTED] texted me...She did not make enough money to pay all her bills...she is hoping she can borrow \$600”;

ESTATE_JPM005339, “[REDACTED] is wondering if she could borrow money to pay her phone bill. She is behind 2 months and they are going to shut off if she doesn’t pay...Her bill is \$272.”;

ESTATE_JPM005344, “[REDACTED] is asking if she can borrow some money.”;

ESTATE_JPM005363, “[REDACTED]...cannot pay the first and last months rent...she is wondering if she could borrow \$1200 and once she gets her ballet check, she can pay you back.”;

ESTATE_JPM005111, “Would it be possible to borrow money? I don’t have Enough (sic) saved til my first pay check in 2 weeks.”; and

ESTATE_JPM005168. I don’t have money for rent either. Can I borrow from you?”.

Similarly, [REDACTED] would also repeatedly ask for money. For example, ESTATE_JPM005319 and ESTATE_JPM016929.

Carr Opinion E: JPMorgan's Due Diligence Indicates Epstein Was Involved In Sex Trafficking.

Ultimately, a bulk²³⁸ of Ms. Carr's report is spent discussing her subjective interpretation of various emails, transactions, Due Diligence Reports (DDR), and Rapid Response Team (RRT) meetings without any reliable basis in state of the science research or even citations to authoritative/reliable/academic sources. As discussed previously, much of her interpretation is more likely than not skewed by hindsight bias and confirmation bias. For example, the incredulous and baseless claim that "models is (sic) a red flag of trafficking"²³⁹ has absolutely no reliable or objective support and "modeling" as a purported indicator of trafficking would have low rates of sensitivity and specificity if used in any intervention protocol.

For all of the reasons mentioned through this report, JPMorgan's due diligence files regarding Epstein do not contain any reliable "red flags" for sex trafficking. While I will not belabor this point by discussing the lack of empirical basis for each of Ms. Carr's curated citations, I am prepared to elaborate, if needed, at deposition with additional examples (e.g., the Vanity Fair Article contains no reliable red flags of trafficking. In fact, [REDACTED] and [REDACTED] accuse the publication of deliberately omitting information that would have further exposed Epstein's history of sexual abuse).

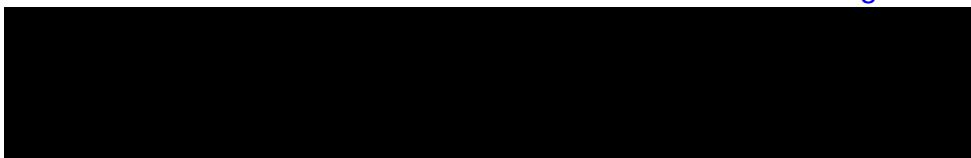
However, of most importance for the rebuttal of the reports issued by the Plaintiff's named experts, I would like to reiterate the following:

1. The cash transactions evidenced in Epstein's accounts are not reliable indicators of commercial sex or human trafficking and were reported in accordance with legal requirements; yet, prompted no additional oversight by law enforcement;
2. While the opening of accounts by third parties can be considered a red flag of trafficking under certain circumstances, this was not included in best practice resources for financial institutions until after the alleged victimization period in the present matter (2014 and later). Moreover, given the totality of the circumstances surrounding these two counts, the activity was atypical of trafficking (e.g., [REDACTED] demonstrably exercised agency and dominion over her account);
3. Epstein's indictment in 2006 is not an "extremely strong" or "conclusive" indication of "sex trafficking," especially during the alleged victimization period in the present matter;
4. A media report of a trafficking investigation, which yields no indictment is not tantamount to actual or constructive knowledge of trafficking;²⁴⁰

²³⁸ Carr Report, Page 27 to 47.

²³⁹ Carr Report, ¶ 70.

²⁴⁰ Especially given the long history of false allegations regarding human trafficking in the United States and abroad—a fact that Ms. Carr wholly ignores. These false claims date back to 1885 with the Maiden Tribute of Modern Babylon expose being based on a fabricated account of alleged sex trafficking (see, for example, Soderlund, Gretchen. Sex trafficking, scandal, and the transformation of journalism, 1885-1917. University of Chicago Press, 2013). Despite this known issue specifically affecting the fidelity of trafficking allegations, Ms. Carr erroneously claims that an allegation in and of itself is a "glaring red flag" for human trafficking (see Carr Report, page 40, paragraph 122).

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5. The internal discussions among JPMC employees about Epstein are not reliably indicative of a “sex trafficking venture”; and
 6. Private air travel is not an evidence-based indicum of sex trafficking.

Not only does Ms. Carr erroneously rely on purported “indicia” that are without any reliable empirical basis, but she claims that these speculative indicators are “significant.” Statistical significance is a determination made by an analyst to assess whether results in the data are explainable by chance alone. Ms. Carr provides absolutely no citation to support her claims of significance and available information can be used to hypothesize that the purported “indicia” or “red flags” discussed in her report would, more likely than not, have low rates of sensitivity and specificity. Ms. Carr’s opinions on the significance of these indicia or “red flags” appear to be rooted in nothing more than her subjective interpretation, which seems heavily influenced by confirmation bias and hindsight bias. For example, throughout her report Ms. Carr refers to [REDACTED] as an “employee” and “co-conspirator” for serving as a paid recruiter for Epstein. Yet, Ms. Carr fails to acknowledge, much less explain, why other paid recruiters, such as [REDACTED] and others are conceptualized as victims. Perhaps this is because conceptualizing these women as victims better fits the Plaintiff’s theory of the case.

For example, [REDACTED] was literally named as a co-conspirator in Epstein’s non-prosecution agreement; yet, Ms. Carr accepts that she was a “sex slave”²⁴¹ because that is how [REDACTED] now self-identifies. Ms. Carr completely ignores countervailing evidence and testimony, which suggests that [REDACTED] may have been a consenting participant. For example, [REDACTED] communications with Epstein are inconsistent with what would be expected from a “sex slave.”²⁴²

Ms. Carr relies heavily on her “experiences” and appears to ignore countervailing fact and empirical evidence. For example, Ms. Carr claims that the term “sugar daddy” is a “red flag” for commercial sex acts and, depending on the context” for human trafficking,²⁴³ without any citation. If Ms. Carr had even done a cursory review on the history and/or research behind the use of the term, she would know that her interpretation is not consistent with the origin of the term or the current use, given the anti- trafficking interventions and anti- commercial sex interventions that are customarily employed on “sugar dating” platforms. Archetypal “sugar dating” relationships involve a May–December romance with an older male who expresses romantic attachment through gift giving and physical touch and a younger, adult female who expresses romantic attachment through quality time and physical touch. Instead, Ms. Carr cites to a blog post, which states that “A sugar baby is a person who receives cash, gifts or other financial and material benefits in exchange for company. It can include sex or intimacy, but it doesn’t have to.”²⁴⁴ While the article recognizes that “sugaring can and does involve sex

²⁴¹ Carr Report, ¶ 107.

²⁴² See, e.g., ESTATE_JPM005234, where [REDACTED] writes, “Please remember you offered to do this last night so don’t tell me I forced you into doing something you detest. I don’t think I was forceful at all.”

²⁴³ Carr Report, ¶ 125

²⁴⁴ Meeghan Sheppard, *Exposing the Exploitative Realities of Sugar Dating, Human Trafficking*

trafficking and prostituted people” like any other form of dating, Ms. Carr somehow misinterprets this finding to support her erroneous opinion that a mention of the term “sugar daddy” is a red flag for commercial sex acts.

Yet, despite the lack of reliable evidence of trafficking, JPMC continued to monitor Epstein’s accounts and cash usage closely²⁴⁵ and reported suspicious activity in compliance with the law and industry standards/best practices that were available at the time. Nevertheless, Ms. Carr erroneously describes JPMC responses to the allegations against Epstein as being illustrative of “belated conclusions.” This is especially counterfactual considering that JPMC’s proactive exiting of Epstein was six years *before* any law enforcement indictment for trafficking, and his indictment concerned pre-2006 conduct.

To this effect, with regards to the remaining opinions, I proffer the following:

1. JPMorgan’s due diligence reports provide no reliable indicia to conclude that Epstein was involved in sex trafficking (Carr Opinion F);
2. Jeffrey Epstein’s JPMorgan accounts illustrate no reliable indicia of sex trafficking (*Carr Opinion G*), for example:
 - a. There is no reliable evidence or indicia to suggest that large cash withdrawals are a reliable indicum of sex trafficking;
 - b. There is no reliable evidence or indicia to suggest that round-dollar wire payments are a reliable indicum of sex trafficking;
 - c. In the absence of an individualized inquiry with alleged survivors, there is no method to objectively and reliably determine which individuals were paid for the facilitation of Epstein’s alleged victimization;
 - d. There is no reliable evidence or indicia to suggest that private air travel is a reliable indicum of sex trafficking; and
 - e. There is no reliable evidence or indicia to suggest that relationships with established modeling firms are a reliable indicum of sex trafficking;
3. There is no reliable evidence or indicia to suggest that Epstein relied on his relationship with JPMC facilitate sex trafficking (Carr Opinion H); and
4. There is no reliable evidence or indicia to suggest JPMC had a unique opportunity to intervene and help Epstein’s alleged victims, especially [REDACTED] who was previously identified as a co-conspirator by law enforcement (Carr Opinion I).

Ultimately, the present matter should not be assessed or evaluated through the lenses of confirmation bias or hindsight bias. In accordance with best practices associated with sentinel events, JPMC will continue to ensure that the bank’s policies, procedures, and internal controls to prevent and detect trafficking remain consistent and evolving with industry standards. (Carr Opinion K).

Search (2020), <https://humantraffickingsearch.org/resource/exposing-the-exploitative-realities-of-sugar-dating/>.

²⁴⁵ JPM-SDNYLIT-00036575 as cited in Carr Report, Page 43.

XI. SECONDARY EXPLOITATION

Opinion

Secondary exploitation is the act of making use of or benefiting from a human trafficking survivor's victimization or the human trafficking phenomenon. Co-conspirators falsely claiming to be victims of trafficking for benefit can be considered a form of secondary exploitation. Similarly, uninjured third parties attempting to financially gain from the victimization of others can be considered a form of secondary exploitation.

Basis

Given the increased international attention on human trafficking, more service providers, practitioners, and politicians are becoming involved in the movement for modern-day abolitionism. However, the incentive for assisting victims of human trafficking is not always entirely altruistic. Qualitative data suggests that there are an increasing number of third parties who are secondarily exploiting human trafficking survivors, persons erroneously identified as victims, and the topic of human trafficking in general.

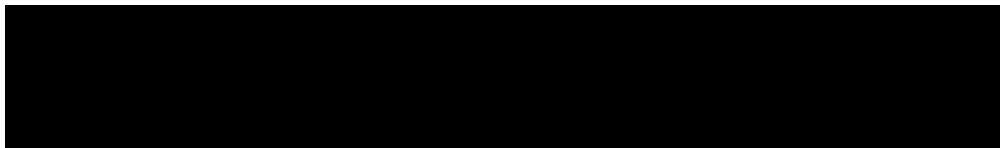
Secondary exploitation can take many forms. Generally, it can be defined as the act of making use of or benefiting from a human trafficking survivor's victimization or the human trafficking phenomenon.²⁴⁶ For example, a human trafficking survivor could be exploited by a third party who wants to tell the victim's story in order to draw attention to themselves or their organization.²⁴⁷ Politicians also use human trafficking and/or the stories of victimizations to help themselves get elected.²⁴⁸ Other types of possible secondary exploitation can include, but are not limited to:

1. Non-trafficked persons who falsely claim to be trafficked due to the associated benefit (e.g., evasion of criminalization, obtaining a T-Visa, or financial benefit through civil litigation);

²⁴⁶ Mehlman-Orozco, Kimberly. (2017). *Hidden in Plain Sight: America's Slaves of the New Millennium*. Praeger.

²⁴⁷ For example, see Cojocaru, C., *My Experience is Mine to Tell: Challenging the abolitionist victimhood framework*, Anti-Trafficking Review, issue 7, 12-38 (2016); Gregoriou, C., & Ras, I. A., *Representations of Transnational Human Trafficking: A Critical Review*, in *Representations of Transnational Human Trafficking: Present-Day News Media, True Crime, and Fiction*, 1, 3-4, 17 (2018); and Bernstein, E., & Shih, E., *The Erotics of Authenticity: Sex Trafficking and “Reality Tourism” in Thailand*, Social Politics: International Studies in Gender, State and Society, 1, 11-15 (Fall 2014).

²⁴⁸ Kimberly Mehlman-Orozco, *In Virginia race, human trafficking must be more than a talking point*, The Hill (Nov. 5, 2017 10:20 AM), <http://thehill.com/opinion/campaign/358814-in-virginia-race-human-trafficking-must-be-more-than-a-talking-point>.

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2. Attorneys who repackage the victimizations of non-trafficked persons as trafficking in order to exploit the litigation advantages a TVPRA claim affords (e.g., longer statutes of limitations, evasion of intentional tort exclusions and caps on punitive damages);²⁴⁹
 3. Attorneys who use the victimizations of trafficked persons to sue unwitting third parties due to the higher prospect of recovering damages (e.g., financial benefit through lawsuits); and
 4. Third parties who blame unwitting third parties for self-interested benefit (e.g., attention or financial gain).

Human traffickers should undoubtedly be held criminally and civilly accountable for their crimes and human trafficking survivors should be provided with services and protected from revictimization and erroneous criminalization. However, the prospect and trends related to secondary exploitation should be acknowledged and assessed by any trier of fact involved with evaluating the credibility of a TVPA claim, especially when made against a third party. Efforts to hold third parties liable, despite no substantive and/or direct involvement with the crime, are at risk of secondarily exploiting the victims and/or secondarily exploiting the topic of trafficking by proffering non-victims as trafficking survivors or blaming unwitting third parties for failed interventions by law enforcement.

As an expert witness, it is not my role to proffer a legal conclusion on whether secondary exploitation is evident in the present matter. However, triers of fact in TVPA cases should undoubtedly be made aware of this phenomenon, as done in other trials.²⁵⁰ This is especially true for the present matter considering:

1. The present claim is unprecedented, given that it was made by a third party against a third party;
2. Epstein survivor [REDACTED] has publicly made accusations that are consistent with secondary exploitation against attorneys Brad Edwards and Stan Pottinger; and
3. Epstein survivors [REDACTED] have publicly accused others who purport to be Epstein survivors of actually being co-conspirators.

²⁴⁹ For example, see Julie Dahlstrom. *Trafficking to the Rescue?*, 54 UC Davis L. Rev. 1, 24-28, 35-38 (2020) and McNeil, Maggie. 2017. Retrieved from the Honest Courtesan Blog. <https://maggiemcneill.com/2017/03/18/in-the-news-722/>. Regarding the latter reference, Ms. McNeill is a retired consenting sex worker who runs a well-known blog about the commercial sex industry entitled *The Honest Courtesan*. Ms. McNeill also perceives some of the third-party liability litigation as secondarily exploitative. Specifically, Ms. McNeill writes that certain cases constitute attempts to “rob” businesses by using “sex trafficking” hysteria as a weapon.”

²⁵⁰ For example, see the trial transcript of *United States v. Mei Xing*, No. 2:20-CR-0228(A)-FMO (C.D. Cal.).

XII. CONCLUSION

Through my education, experience, and research, I have developed a robust, reliable, and evidence-based understanding of human trafficking, methods of recruitment and control utilized by human traffickers, characteristics of victims, distinction between sex trafficking and prostitution, and the typologies of commercial sex consumers, as well as the evolution and efficacy of anti-trafficking interventions. I have trained law enforcement on my findings and have been retained on many cases involving Trafficking Victims Protection Act (TVPA) claims, with a particular familiarity with allegations against third parties. Additionally, unlike the Plaintiff's named experts, the reliability of my testimony has been vetted in courtrooms across the United States.

As previously discussed, although Epstein's crimes are atypical of human trafficking, it is undeniable that Epstein was a sexual predator, who engaged in illicit behavior to the physical and emotional detriment of an unknown number of women and children. If law enforcement had intervened when they were first contacted by Epstein's victims, it is more likely than not that many of Epstein's crimes could have been prevented. Even so, JPMC decided to end its business relationship with Epstein *six years before* Epstein was charged with sex trafficking.

Hindsight bias should not color the interpretation of the facts that were available to JPMC during the alleged victimization period. Using an objective assessment regarding the knowledge that was available to law enforcement and the private sector at the time, JPMC's policies, procedures, and internal controls to prevent and detect trafficking were consistent with industry standards. Moreover, there are no facts in evidence to suggest that Epstein's crimes would have been prevented if his business relationship with JPMC ended sooner. Additionally, there are no facts in evidence to suggest that Epstein's crimes would have been prevented if JPMC [REDACTED]

In the absence of an overt disclosure, sex trafficking is a clandestine crime and as a result victims can be difficult to identify and are frequently misidentified, even by trained law enforcement, social workers, and healthcare providers. The allegations regarding Epstein's sexual victimizations in particular were atypical of sex trafficking and therefore, to a reasonable degree of social scientific certainty, these victimizations were more difficult to detect by third parties in the absence of law enforcement intervention. This is especially the case in the private sector, considering that indicia of "sex trafficking" in the banking industry have not been adequately evaluated for sensitivity or specificity. Moreover, regarding the present matter, the purported "best practice" indicia of sex trafficking for the financial services industry are overwhelmingly inconsistent with the allegations in this case.

Ultimately, claims of alleged sex trafficking, especially those made by third parties against third parties, are at high risk of secondary exploitation. Secondary exploitation is also of particular concern in the present matter given the allegations by Epstein's victims against others who purport to be victims, but are accused of being co-conspirators. Given the information that I have reviewed

[REDACTED]

in preparation for this report, I have concluded that it is of the utmost importance for the trier of fact in the present matter to be empowered with evidence based and reliable data, while shielded from misinformation, unsupported speculation or subjective belief, or ecological fallacies and fallacies of composition.

APPENDIX A. Curriculum Vitae

DR. KIMBERLY B. MEHLMAN-OROZCO

(703) 362-9405 kim@mehlmanorozco.com www.mehlmanorozco.com

EDUCATION

Doctor of Philosophy

Criminology, Law and Society
George Mason University

Dissertation: The “Crimmigration” Affect: An Analysis of 287(g) and Latino/a Representation in the U.S. Juvenile Justice System

Expertise: Human Trafficking, Human Smuggling, Immigration, Survey Methods and Systematic Review

Master of Arts

Justice, Law, and Crime Policy
George Mason University

Thesis: Foreign Nationals and Crime: An Exploratory Analysis of Undocumented Migrants in Northern Virginia

Bachelor of Science

Administration of Justice
George Mason University

Cum Laude

TEACHING EXPERIENCE

Surviving and Thriving Beyond Sex Trafficking SP18

Ph.D. Research Course
Sustainability Education
Prescott College

CRIM307 Social Inequality, Crime, and Justice FA17

Criminology, Law and Society
George Mason University

CRIM405 Law and Justice Around the World

SP17, SP18
Criminology, Law and Society
George Mason University

CRIM308 Human Rights and Justice

FA16
Criminology, Law and Society
George Mason University

CCJS100 Intro to Criminal Justice

FA12-SP14
Department of Criminology & Criminal Justice
University of Maryland College Park

CCJS370 Race and Crime

FA12-SP14
Department of Criminology & Criminal Justice
University of Maryland College Park

CCJS432 Law of Corrections

FA12

[REDACTED]

Department of Criminology & Criminal Justice
University of Maryland College Park

CCJS418J Foreign Nationals and Crime

FA12-SP13
Department of Criminology & Criminal Justice
University of Maryland College Park

CRIM490 Foreign Nationals and Crime

SU09, SU10, SU11, SU12
Criminology, Law and Society
George Mason University

**GED, Work Place Essential Skills,
and Adult Basic Education**

SU05-SU06
Adult Detention Center
Prince William County

RESEARCH EXPERIENCE

CEO

FA19– Present
Break the Chain

Executive Director

WI18– Present
Freedom Light

Partner/Human Trafficking Expert Witness

FA16– WI18
Mahn, Mehlman & Associates

Human Trafficking Subject Matter Expert

SU16-FA17
RAND Corporation

Executive Director/Human Trafficking Consultant

WI12– FA16
The Justitia Institute

Director

FA10 – WI12
Latino Policy Institute
Roger Williams University

Research Associate

SU11 – WI12
Cochrane Collaboration College for Policy
George Mason University

Lead Clinical Trials Search Coordinator

SU10 – WI12
Justice Health Field
The Cochrane Collaboration

Senior Research Associate

SU08 – SU11
OJJDP Census of Juveniles on Probation
George Mason University

Graduate Research Assistant

SU10 – FA10
Violence and Victimization Research Division

National Institute of Justice (On Contract)
Office of Justice Programs

Senior Fellow

SU08 – FA10
The Lloyd Society

Graduate Research Assistant

SU06 – SU08
Trinidad & Tobago Crime Reduction Project
George Mason University

Graduate Research Assistant

WI07-SP07, SP08
OJJDP Vaccines for Children Project
George Mason University

PUBLICATIONS

Lowery-Keith, Jennifer and **Kimberly Mehlman-Orozco** (2022). ‘Justice Denied’: A Sex Trafficking Survivor Tells Her Story. *The Crime Report*.

Mehlman-Orozco, Kimberly B and Greg Bristol. (2021). Suing Social Media Sites Won’t Curb Sex Trafficking: Advocates. *The Crime Report*.

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Mehlman-Orozco, Kimberly B. and William D. Snyder. (2019). “Legalizing prostitution could end sex-trafficking investigations.” *The Hill*.

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Mehlman-Orozco, Kimberly B. (2017). “Trafficking victims get lost under unjust criminal convictions.” *The Hill*.

Mehlman-Orozco, Kimberly B. (2017). “Projected Heroes and Self-Perceived Manipulators: Understanding the Duplicitous Identities of Human Traffickers.” *Trends in Organized Crime*.

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Mehlman-Orozco, Kimberly. (2017). “Why we should question the FBI’s recent human trafficking sting.” *Thomson Reuters*.

Mehlman-Orozco, Kimberly. (2017). “Decriminalize sex work to bring trafficking victims out of the shadows.” *The Hill*.

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Mehlman-Orozco, Kimberly B. (2017). “Identifying Victims of Human Trafficking.” *Dimensions of Dental Hygiene*.

Syme, Sheryl, Camardese, Susan, and **Kimberly Mehlman-Orozco**. (2017). “Human Trafficking: Red Flags for Dental Professionals.” *Decisions in Dentistry*.

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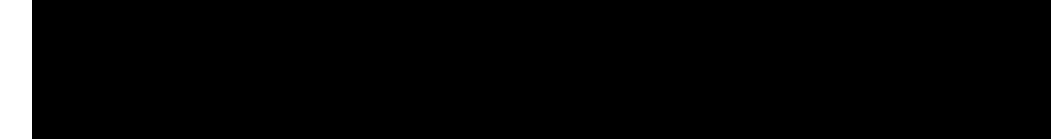
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Mehlman-Orozco, Kimberly B. (2017). “Sex Trafficking: A Surprising Rescue Story.” *The Crime Report*.

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Mehlman-Orozco, Kimberly B. (2016). "The Reality of Sex Trafficking in Washington's Red Light District." *Baltimore Sun*.

Mehlman-Orozco, Kimberly B. (2016). "America's Symbolic, Not Effective, Anti-Trafficking Policy." *Diplomatic Courier*.

Mehlman-Orozco, Kimberly B. (2016). America's Anti-Trafficking Efforts: Hollow victories for public accolade. *Connection Newspapers*: Chantilly, Centerville, Great Falls, Herndon, McLean, & Vienna.

Mehlman-Orozco, Kimberly B. (2016). "Sex Slaves or Prostitutes?: How Human Trafficking is Hidden in Plain Sight in America's Capital." *Diplomatic Courier*.

Mehlman-Orozco, Kimberly B. (2015). "Safe Harbor Legislation for Juvenile Victims of Sex Trafficking: A Myopic View of Improvements in Practice." *Social Inclusion*.

Mehlman-Orozco, Kimberly B. (2015). "Tor and the Bitcoin: An Exploration into Law Enforcement Surveillance Capability Online". *Diplomatic Courier*.

Mehlman-Orozco, Kimberly B. (2014). "Human Trafficking in the Philippines: A Blemish on Economic Growth". *Diplomatic Courier, Recovery in the Philippines*.

Mehlman-Orozco, Kimberly B. (2014). "Devoid of Research: An Evaluation of Human Trafficking Interventions". *Diplomatic Courier, Special Issue: Breaking the Cycle of Human Trafficking*.

Martinez, Ramiro, and **Mehlman-Orozco, Kimberly B.** (2014). "Hispanic Immigration and Crime". *Oxford Handbook of Ethnicity, Crime, and Immigration*. Eds. Michael Tonry and Sandra Bucerius. Oxford University Press.

Mehlman-Orozco, Kimberly B. (Contributing Author) (2010) "Breaking It Down: Justice, Law & Society Abstracts for Policymakers and Practitioners". *Center for Justice Law and Society*.

REPORTS

Mehlman-Orozco, Kimberly B. (2022). W.K. et. al., v. Red Roof Inn, et. al. Civil Action Number 1:20-cv-5263.VHC.

Mehlman-Orozco, Kimberly B. (2022). Jane Does 1-4. v. Red Roof Inn, et. al. Civil Action Number 1:21-cv-04278-WMR.

Mehlman-Orozco, Kimberly B. (2022). J.A.. v. Red Roof Inn, et. al. Civil Action Number 1:21-cv-03655-TWT.

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Mehlman-Orozco, Kimberly B. (2022). G.D. v. Red Roof Inn, et. al. Civil Action Number 02631.

Mehlman-Orozco, Kimberly B. (2022). Jane Doe v. Fairfax County Police. 1:21cv1150(AJT/JFA).

Mehlman-Orozco, Kimberly B. (2022). S.Y. v. Inn of Naples Hotel LLC and Inn of Naples, LLC. Case No.: 2:20-cv-00609-JES

Mehlman-Orozco, Kimberly B. (2022). S.Y. v. Naples Hotel Company and the Gulfcoast Inn of Naples Owners Association, Inc. 2:20-cv-00608

Mehlman-Orozco, Kimberly B. (2022). C.S. v. Inn of Naples Hotel, LLC and Inn of Naples, LLC 2:20-cv-00629

Mehlman-Orozco, Kimberly B. (2022). C.S. v. Naples Hotel Company and the Gulfcoast Inn of Naples Owners Association, Inc. 2:20-cv-00631

Mehlman-Orozco, Kimberly B. (2022). The People of the State of California v. Rachele Eschenburg. Case Number: FCR350232

Mehlman-Orozco, Kimberly B. (2022). People of the State of California v. Diane Mirabal. Superior Court of the State of California for the County of Santa Clara. Case No.: 98312

Mehlman-Orozco, Kimberly B. (2022). Casilao et. al. v. Hotelmacher LLC, et. al. Case No.: CIV-17-800-SLP

Mehlman-Orozco, Kimberly B. (2022). Jane Doe v. TRX Insurance Services, Inc and Richard Metz. United States District Court for the Eastern District of Pennsylvania. Civil Action No. 2:20-cv-04095-MMB

Mehlman-Orozco, Kimberly B. (2021). Expert Witness Report. *Heidi Gilbert, Amber Means, Mandy Meloon, Gabriela Joslin, and Kay Poe, v. U.S.A Taekwondo, Inc.*, District of Colorado. 1: 18-cv-00981-CMA-MEH

Mehlman-Orozco, Kimberly B. (2020). Expert Witness Report. *M.B. v. Roosevelt Inn, LLC, et al.*

Mehlman-Orozco, Kimberly B. (2017). Expert Witness Report. Keo Ratha et. al. v. Phatthana Seafood Co., et. al. Case No. 16-2-28453-1 KNT.

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Mehlman-Orozco, Kimberly B. (2017). Expert Witness Report. *State of Ohio v. Michael Moore*. CR 16-3191.

Mehlman-Orozco, Kimberly B. (2011). The Effects of In-State Tuition for Non-Citizens: A Systematic Review of the Evidence. *Latino Policy Institute at Roger Williams University*. <http://www.rwu.edu/depository/lpi/lpi-report.pdf>

Mehlman-Orozco, Kimberly B. (2008). Race and Reporting Burglary, Robbery, and Assault in Trinidad and Tobago. (Completed under a grant from the Trinidad and Tobago Government).

SCHOLARLY PRESENTATIONS

Mehlman-Orozco, Kimberly B. and Greg H. Bristol. (Forthcoming, April 2023). Lies, Damn Lies, and Human Trafficking Statistics: The Truth Behind America's Failing War Against Modern Slavery. IAPSC Annual Conference.

Trasatti, Marisa and **Mehlman-Orozco, Kimberly B.** (2022). Hotel Industry and Human Trafficking. South Carolina Bar Convention.

Trasatti, Marisa and **Mehlman-Orozco, Kimberly B.** (2021). Human Trafficking Is Growing Exponentially: What your Corporation and Clients Need to Know about the Evolving Litigation Landscape. Lawyers for Civil Justice Conference.

Trasatti, Marisa, **Mehlman-Orozco, Kimberly B.**, Harvey, Brittany. (2021). Human Trafficking: The Silent Risk. RIMS Annual Conference.

Trasatti, Marisa, **Mehlman-Orozco, Kimberly B.**, Yesowitch, Irene, Vorndran, Maryann, and Miller, Graham. (2020). Training to Combat Human Trafficking at Your Commercial Premise. Cyber, Management & Professional Liability Conference.

Trasatti, Marisa, **Mehlman-Orozco, Kimberly B.**, Clark, Fran, et. al. (2020). Training to Combat Human Trafficking at your Commercial Premise— Learn the Emerging Risks, Litigation Issues and Preventative Measures. Claims and Litigation Management Alliance Conference.

Trasatti, Marisa, **Mehlman-Orozco, Kimberly B.**, Ewing, Lance. (2020). Human Trafficking: The Silent Risk. Claims and Litigation Management Alliance Conference.

Mehlman-Orozco, Kimberly B. (2019). Keynote Speaker: National Capital Region Threat Intelligence Consortium (NTIC) Human Trafficking Seminar.

Mehlman-Orozco, Kimberly B. (2019). Law Enforcement's Role in Combating Human Trafficking and Assisting Victims. Police Executive Research Forum (PERF).

Mehlman-Orozco, Kimberly B. and Marisa Trasatti (2019). Human Trafficking: The Silent Risk. The RIMS (Risk Management Society) Conference.

Mehlman-Orozco, Kimberly B. (2019). Social Policy and Justice Panelist. Harvard College Project of

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Asian and International Relations. Harvard University.

Mehlman-Orozco, Kimberly B. (2018). Women in Homeland Security Human Trafficking Symposium Panelist. Marymount University.

Mehlman-Orozco, Kimberly B. (2017). Human Trafficking Symposium Panelist. Liberty University School of Law.

Martin, Favian, **Mehlman-Orozco, Kimberly**, and Wooditch, Alese. (2014). Mexican Migration to the United States: An Exploratory Study into Illegal Border Crossings. Academy of Criminal Justice Sciences. Philadelphia, PA

Mehlman-Orozco, Kimberly B. (2010). "Justice Health Systematic Review Methods," Presented at the annual colloquium of the Cochrane and Campbell Collaborations: Keystone, CO.

Mehlman-Orozco, Kimberly B. (2010). "Open Access Systematic Reviews for Juvenile Probation Information," Presented at the first annual OJJDP Probation Summit: Washington, D.C.

Mehlman-Orozco, Kimberly B., Chirieleison, J., Sebold, C. M., Douds, A., Gallagher, A.M., and Gallagher, C.A. (2010). "Characteristics of Juveniles on Probation: Collecting Data from Atlantic to Pacific". Presented at the 2010 American Probation and Parole Association Conference: Washington, D.C.

Mehlman-Orozco, Kimberly B. (2010). "Justice Health Search Methods: PubMed and More," Presented at the International Network for Justice Health Meeting: Scottsdale, AZ.

Gallagher, C.A., Douds, A.S., **Mehlman-Orozco, Kimberly B.**, Chirieleison, J., and Olaghene, A. (2010). "Justice Health Bibliographic Data Mapping," Presented at the International Network for Justice Health Meeting: Scottsdale, AZ.

Mehlman-Orozco, Kimberly B. (2010). "Smuggling and the Likelihood of Detention among Undocumented Migrants," Law and Society Association Conference: Chicago, IL.

Douds, Anne S. and **Mehlman-Orozco, Kimberly B.** (2010). "FASD in Justice Facilities: What does the research tell us?", Meeting of the Interagency Coordinating Committee on Fetal Alcohol Spectrum Disorders: Rockville, MD.

Gallagher, Catherine, Taxman, Faye, Kinner, Stuart, Doyle, Jodie, Pardo-Rengifo, Monica, **Mehlman-Orozco, Kimberly B.**, Olaghene, Ajima, Royle, Nick, Gabriel Cuervo, Luis. (2009). "Knowledge mapping for research prioritization: examples from the Network for Justice Health". 17th Cochrane Colloquium, Singapore.

Mehlman-Orozco, Kimberly B. (2009). "Justice Health Systematic Review Methods," Presented at the International Network for Justice Health Meeting: Orlando, FL.

Mehlman-Orozco, Kimberly B. (2008). "Foreign Nationals and Crime: An Exploratory Analysis of Undocumented Migrants in Northern Virginia," American Society of Criminology Conference: St. Louis, MO.

OTHER PRESENTATIONS

Mehlman-Orozco, Kimberly B. (2018). Invited Trainer on Human Trafficking Provided to the Advancing the Business of Healthcare Medical Coding Chapter in Woodbridge, Virginia (2 CEUs).

Mehlman-Orozco, Kimberly B. (2018). Invited Trainer on Human Trafficking for the Canadian Police College Human Trafficking Investigator's Course, Royal Canadian Mounted Police and Halifax Regional Police, Canada.

Mehlman-Orozco, Kimberly B. (2018). Invited Annual Speaker for the College of Humanities and Social Sciences Degree Celebration, George Mason University.

Mehlman-Orozco, Kimberly B. (2018). Invited Presenter for the Well Library Honors Event, George Mason University.

Mehlman-Orozco, Kimberly B. (2017). Invited Training Presentation on Human Trafficking Red Flags for Prevent Abuse and Neglect through Dental Awareness (P.A.N.D.A.).

Mehlman-Orozco, Kimberly B. (2017). Invited Guest Speaker for Human Trafficking Awareness Event with Kappa Delta Phi International Sorority, George Mason University.

Mehlman-Orozco, Kimberly B. (2017). Invited Guest Speaker at the Mother's Union International Conference Human Trafficking Forum.

Mehlman-Orozco, Kimberly B. (2017). Invited Guest Speaker at the Keeping Our Youth Safe Conference. Bernadette's House.

Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker for Girls at High-Risk of Sex Trafficking. Manassas City Police Department.

Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker on Human Trafficking. Woodbridge Woman's Club.

Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker for TEAM Summer Quest: High-Risk Youth Diversion Program. Manassas City Police Department.

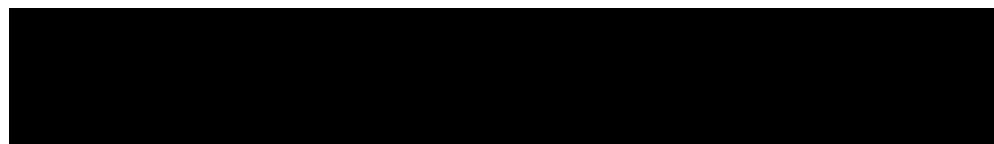
Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker on Human Trafficking. Soroptimist International, Alexandria Chapter.

Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker on Human Trafficking. Republican Women of Clifton.

Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker on Human Trafficking in Northern Virginia. Westminster at Lake Ridge.

Mehlman-Orozco, Kimberly B. (2016). Keynote Speaker. Soroptimist Human Trafficking Awareness Event.

Mehlman-Orozco, Kimberly B. (2015). Invited Guest Speaker on Human Trafficking. Trinity Episcopal Church.



Mehlman-Orozco, Kimberly B. (2015). Invited Guest Speaker for TEAM Summer Quest: High-Risk Youth Diversion Program. Manassas City Police Department.

Mehlman-Orozco, Kimberly B. (2014). Invited Guest Speaker for TEAM Summer Quest: High-Risk Youth Diversion Program. Manassas City Police Department.

Mehlman-Orozco, Kimberly B. (2014). Invited Guest Speaker on Mapping Suspected Human Trafficking Networks through Advertisements. Homeland Security Investigations, DHS, Buffalo, NY.

Mehlman-Orozco, Kimberly B. (2013). Exhibitor. Governor's Summit on Human Trafficking. Richmond, VA.

Mehlman-Orozco, Kimberly B. (2013). Invited Guest Speaker on Labor Trafficking. St. Francis of Assisi Catholic Church.

Mehlman-Orozco, Kimberly B. (2011). Keynote Speaker. First Annual Quetzal Award Gala. Guatemalan Center of New England.

EXPERT WITNESS CASES—CONSULTATION AND/OR TESTIMONY

Forthcoming	Woodhull Freedom Foundation et al. v. United States.
2023	People of the State of California v. Angelina Avila Case No. BA508653-02
2023	M.H. v. G6 Hospitality LLC, et. al. United States District Court Eastern District of Texas Sherman Division. 4:22-cv-198
2023	United States of America v. Kamal Bhula, et al. United States District Court, For the District of New Mexico. Case No. 1:19-cr-01631-DHU
2023	United States of America v. Mei Xing, United States District Court for the Central District of California. No. 2:20-CR-0228(A)-FMO
2023	Jane Doe v. Fairfax County Police. 1:21cv1150(AJT/JFA).
2022	Charity Pearrow v. ESA P Portfolio LLC, et. al. 21-cv-62276-BLOOM/Valle
2022	K.R. v. 4200 Roosevelt LLC, et. al. Case Number 00552
2022	C.A. v. 4200 Roosevelt LLC, et. al. Case Number 03355
2022	B.H. v. 4200 Roosevelt LLC, et. al. Case Number 03356
2022	K.C. v. 4200 Roosevelt LLC, et. al. Case Number 01926

2022	T.E. v. 4200 Roosevelt LLC, et. al. Case Number 00994
2022	V.S. v. 4200 Roosevelt LLC, et. al. Case Number 00997
2022	Sherman, Gozun, and Nash v. Trinity Teen Solutions, Inc. Case Number 20-CV-215-SWS
2022	N.Z. v. Knights of Trevose, et. al. Civil Action Number 02642
2022	G.D. v. Knights of Trevose, et. al. Civil Action Number 02631
2022	Jane Doe 1-4 v. Red Roof Inns, Inc., et. al. Civil Action Number 1:21-cv-04278-WMR
2022	W.K., et. al. v. Red Roof Inns, Inc., et. al. Civil Action Number 1:20-cv-5263-VHC
2022	J.A. v. Red Roof Inns, Inc., et. al. Civil Action Number 1:21-cv-03655-TWT
2022	Casilao et. al. v. Hotelmacher LLC, et. al. Case No.: CIV-17-800-SLP
2022	S.Y. v. Inn of Naples Hotel LLC and Inn of Naples, LLC. Case No.: 2:20-cv-00609-JES
2022	S.Y. v. Naples Hotel Company and the Gulfcoast Inn of Naples Owners Association, Inc. 2:20-cv-00608
2022	C.S. v. Inn of Naples Hotel, LLC and Inn of Naples, LLC 2:20-cv-00629
2022	C.S. v. Naples Hotel Company and the Gulfcoast Inn of Naples Owners Association, Inc. 2:20-cv-00631
2022	People of the State of California v. Diane Mirabal. Superior Court of the State of California for the County of Santa Clara. Case No.: 98312
2021-2022	MADELYN CASILAO, HARRY LINCUNA, and ALLAN GARCIA, on behalf of themselves and all others similarly situated, Plaintiffs, v. HOTELMACHER LLC, dba HOLIDAY INN EXPRESS; STEAKMACHER, LLC, dba MONTANA MIKE'S STEAKHOUSE; SCHUMACHER INVESTMENTS, LLC, dba WATER ZOO; APEX USA, INC.; WALTER SCHUMACHER; and CAROLYN SCHUMACHER, Defendants. UNITED STATES DISTRICT COURT WESTERN DISTRICT OF OKLAHOMA Case No.: CIV-17-800-SLP

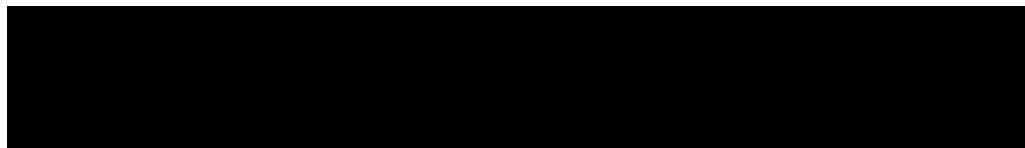
2021-2022	Jane Doe v. TRX Insurance Services, Inc and Richard Metz. United States District Court for the Eastern District of Pennsylvania. Civil Action No. 2:20-cv-04095-MMB
2021-2022	The People of the State of California v. Rachele Eschenburg. Case Number: FCR350232
2021	Heidi Gilbert, Amber Means, Mandy Meloon, Gabriela Joslin, and Kay Poe, v. U.S.A Taekwondo, Inc., District of Colorado
2019-2021	United States v. Matthew Woods, United States District of New Mexico
2019	United States v. Adonis Baker, United States District of New Mexico
2019	United States v. Cornelius Galloway, United States District of New Mexico
2018	RCMP Federal Serious and Organized Crime R vs. Downey & Beals C/O Human Trafficking 2016-465660, Halifax, Canada
2018	United States of America vs. Savanah April Via, U.S. District Court for the District of Arizona
2018	Commonwealth of Virginia v. Corey Cardoza, Henrico County
2018	People v. Kareem Abdur-Razzaaq, Ind. No. 3154/2013, and People v. Lemuel Skipper, Ind. No. 2409/2015, Bronx County
2017-2020	United States of America v. Miguel Scott Arnold, Terrence Hawkins, Tevin Bynoe, Emonie Murphy, and Joshua Guity-Nunez, United States District Court for the Middle District of Pennsylvania.
2017- 2018	Doe v. Subh Properties, et al., Civil Litigation, State of Maryland
2017-2018	State of Ohio v. Michael Moore, Lucas County Court
2017-2018	People of the State of California Plaintiff v. Tracy Sims Superior Court of California, County of Los Angeles
2017	Keo Ratha; Sem Kosal; Sophea Bun; Yem Ban; Nakry Phan; and Sok Sang v. Phatthana Seafood Co., Ltd; S.S. Frozen Food Co., Ltd.; Doe Corporations 1-5; Rubicon Resources, LLC; and Wales & Co. Universe, Ltd. United States District Court for the Central District of California

2017	In re: REFLEX MEDIA, INC., a Nevada corporation, Claimant, vs. VIBE MEDIA, INC. d/b/a CityVibe.com, a California corporation; SOPHIA THOMPSON, an individual; PEAKRIDGE d/b/a SugarModels.com, an Anguilla company; DANIEL ROMAN a/k/a Daniel Romanesse, an individual; ALI ASKARI, an individual; and DOES 1 through 10, inclusive
2016-2017	J.S., S.L., and L.C. v. Village Voice Media Holdings LLC, Supreme Court of the State of Washington
2016-2017	People of the State of California Plaintiff v. James Joseph, et. Al. Contra Costa County Court
2016	People of the State of California Plaintiff v. Young Kyung Cho Superior Court of California, County of Los Angeles
2016	People of the State of California Plaintiff v. Mixon-Givens Santa Clara County Court

SELECTION OF MEDIA

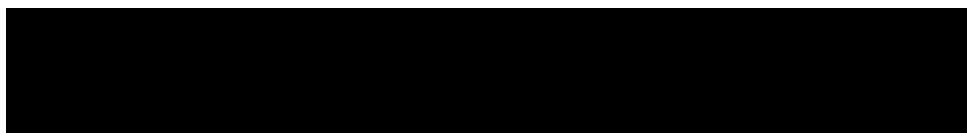
April 6, 2023	Forbes. Sex Traffickers Used America's Favorite Family Safety App To Control Victims. Forbes.
January 10, 2023	U.S. News & World Report. Jury Hears Case Alleging 4 Cops Enabled Prostitution Ring.
September 1, 2022	Court TV. Only Fans Model Murder Case.
July 31, 2022	CGTN. Kimberly Mehlman-Orozco on the role of internet in human trafficking.
July 22, 2022	Court TV. Crystal Kizer: Sex Trafficking Murder Case.
December 16, 2021	NPR. The Facts Of, The Myths About, And The Solutions For Child Trafficking.
April 24, 2021	CBS News. Manhattan District Attorney's office to stop prosecuting prostitution cases.
April 10, 2021	Fox News. Human smugglers using social media to transport migrants to US: Reports.
April 4, 2021	Forbes. Inside the \$4.5 Billion Erotic Massage Parlor Economy.
July 4, 2020	CBS News. Epstein's alleged accomplice Ghislaine Maxwell set to be arraigned next week.

January 23, 2020	Skift. Opening Closed Doors: Can Hotels Do More to Fight Human Trafficking?
August 9, 2019	ABC. This Week with George Stephanopoulos. Panel discussion on Jeffrey Epstein.
July 9, 2019	CBS News. Sex trafficking expert discusses Jeffrey Epstein case and sexual abuse.
May 10, 2019	Hollywood Reporter. Sex Trafficking mars the Mystique of Cannes Film Festival.
April 12, 2019	The Hill. Expert says it's 'very unlikely' Robert Kraft prostitution case would yield human trafficking convictions.
March 21, 2019	CBS. Robert Kraft solicitation charge puts spotlight on sex trafficking.
March 4, 2019	The Washington Post. Surveillance cameras, suitcases and billionaires: How an investigation into massage parlors unfolded in Florida.
March 1, 2019	USA Today. From harmful fetishes to sex trafficking, Robert Kraft case highlights risks facing Asian women.
February 24, 2019	CNN. Robert Kraft allegations: A sex trafficking expert weighs in.
January 11, 2019	The Seattle Times. Documentary puts new attention on R. Kelly sex allegations.
August 22, 2018	The Crime Report. Backpage Founders: We're Victims of Attack on Free Speech.
May 5, 2018	Delaware Online. Human Trafficking Court shut down, to be merged with other treatment courts in Delaware.
May 1, 2018	Delaware Online. Despite good intentions, Delaware slow to address human trafficking.
April 24, 2018	ABC. Will new law protect women from sex trafficking?
April 23, 2018	The Ringer. How Sex Ads Became a Battleground for the Future of the Internet.
April 22, 2018	Miami Herald. He pimped a minor at Santa's Enchanted Forest. He got slapped with federal prison.
April 13, 2018	Yahoo Lifestyle. Women's March lambasted for criticizing



shutdown of Backpage.com.

- April 10, 2018 Miami Herald. Florida's sex industry 'in a panic' after feds shut down notorious Backpage website.
- April 9, 2018 The Crime Report. With Backpage Closed, Where Will The Sex Slave Trade Go?
- March 22, 2018 Washington Post. Bill enabling prosecutors, victims to pursue websites that host sex traffickers heads to White House.
- March 2, 2018 Governing. 3 Cities Lead Fight Against Human Trafficking.
- February 1, 2018 Vanity Fair. The Republican Party is Having Another Todd Akin Fiasco.
- February 1, 2018 New York Magazine. Missouri GOP Senate Hopeful Goes Off the Deep End on the Sexual Revolution and Human Trafficking.
- January 31, 2018 Kansas City Star. Josh Hawley blames sex trafficking on 'sexual revolution' of 1960s in leaked audio.
- January 25, 2018 Homeland Security Today. Expert Delves Into Real Face of Human Trafficking: Victims and Perpetrators.
- January 23, 2018 Huffington Post. Study Finds More Than 9,000 Brothels Masquerading As Legit Businesses.
- January 11, 2018 International Business Times. Human trafficking: Why we are all guilty of supporting the modern slave trade.
- January 8, 2018 Majority Report Radio. America's Slaves of the New Millennium with Dr. Kimberly Mehlman-Orozco.
- December 21, 2017 Fast Company. Hotels Are Key In The Fight To End Human Trafficking.
- December 12, 2017 WNPR. The Colin McEnroe Show. Child Labor In America And Abroad.
- November 4, 2017 C-SPAN. Hidden in Plain Sight Book Talk.
- September 22, 2017 Gray Media. Interview by Kyle Midura. Sex Trafficking Internet Crackdown Proposal.
- August 8, 2017 i24 news. Interview for Stateside with David Shuster. Model allegedly kidnapped for dark web auction.
- August 2, 2017 Newsy. Interview for "The Why" on human trafficking on the



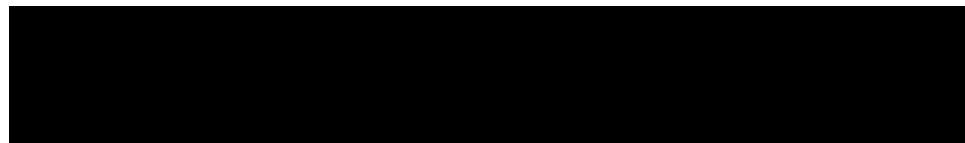
Internet.

- July 30, 2017 Al Jazeera. Segment Produced by Ruairi Casey. World Day Against Human Trafficking.
- July 25, 2017 Fox News Radio. Interviewed by Eben Brown. "Security America" segment on human smuggling deaths in San Antonio.
- July 25, 2017 Dallas News. Interviewed by Sarah Mervosh. New trick of the sex trade: Pimps can use retail gift cards to buy Backpage.com ads.
- July 24, 2017 WJLA. Interviewed by Stephen Loiaconi. Human smuggling deaths underscore need for immigration reform, experts say.
- July 18, 2017 The Washington Post. Interviewed by Tom Jackman. Under attack, Backpage.com has its supporters as anti-trafficking tool. But many differ.
- June 11, 2017 PJ Media. Interviewed by Karl Herchenroeder. Expert Notes Gap in Human-Trafficking Laws as Senators Press for Fund Renewal.
- April 19, 2017 WYPR. Interviewed by Tom Hall. Misinformation Sparked #DCMissingGirls Outrage, But It Highlights Real And Overlooked Issues.
- March 30, 2017 CBS. Interviewed by Jennifer Earl. Mom's warning about "human trafficking" at IKEA goes viral; what you need to know.
- March 29, 2017 Women's Health. Interviewed by Korin Miller. This Mom Claims She Encountered Human Traffickers At IKEA And People Are Freaking Out.
- February 10, 2017 Miami Herald. Interviewed by David Ovalle. Florida lawsuit targets website decried as hub for human trafficking.
- February 3, 2017 Miami Herald. Interviewed by David Ovalle. The 'adult' section might be closed but Miami sex workers still on the job.
- January 1, 2017 OutSmart Magazine. Interviewed by Dr. Laura McGuire on Human Trafficking. Hidden in Plain Sight: Researcher Dr. Mehlman-Orozco Discusses the Realities of Human Trafficking.
- February 3, 2015 NBC. Interviewed by Tracy Connor. Shoe Bomber has 'Tactical Regrets' Over Failed American Airlines Plot.
- January 19, 2015 CNN. Interviewed by Pam Brown. 'Jihad Jane' moved by 'love' and feminine 'pride.'
- August 15, 2013 USA Today, Interviewed by Yamiche Alcindor. Dozens of States Pass Laws to Fight Human Trafficking.

June 6, 2013	USA Today. Interviewed by Yamiche Alcindor. Blue Campaign by DHS aims to combat human trafficking.
August 12, 2012	Fox 5 News (DC/MD/VA). Television interview on in-state tuition report on Maryland. Interview by reporter Shawn Yancy.
May 18, 2011	Chronicle of Higher Education. Interviewed for an in-state tuition story by Katherine Mangan, "In-State Tuition for Illegal Immigrants Can Be a Plus for Both States and Students."
March 24, 2011	NBC 10 (RI). Television interview on Latino population growth, "Digging Deeper: Hispanics on the Rise."
February 18, 2011	The Yale Herald. Interviewed for a story on racial profiling against immigrants by police. Story by Lucas Iberico-Lozada, "East Haven Police Accused of Brutality, Racism."
June 2, 2010	Style Weekly. Interviewed for a human trafficking story by Peter Galuszka, "The New Slavery: Virginia becomes haven for human trafficking."

OTHER PROFESSIONAL TRAINING

Intelligence Community Conference Summer 2021	Conference	Traffik Analysis Hub
Transportation Industry Against Human Trafficking Fall 2020	Presentation	U.S. Department of Commerce
"Freedom Together" D.C., M.D., and V.A. Regional Anti Human Trafficking Task Force Conference Spring 2018	Conference	D.C., M.D., and V.A. Task Forces
Virginia Forum on Human Trafficking Fall 2015	Conference	Dept. of Criminal Justice Services
Regional Conference of Human Trafficking Task Forces Fall 2015	Conference	DMV Anti-Trafficking Working Group
Maryland Freedom Conference Winter 2015	Conference	Towson University
Sharing Lessons, Sharing Responsibility: Combating Human Trafficking Spring 2013	Conference	Migration Policy Institute
Freedom Network Annual Conference Spring 2013	Conference	Freedom Network



Human Trafficking Panel Discussion Spring 2013	Working Group	George Washington Law
Analytic Statistics and Meta Analysis Spring 2011	Paid Training	Stata
Systematic Review and Meta Analysis Spring 2009, Fall 2010	Independent Graduate Study	GMU
PubMed, NLMGateway, ToxNet and ClinicalTrials.gov Summer 2009	Search Certifications	National Library of Medicine
Ovid, ProQuest, and Web searches Summer 2009	Search Certifications	AHRQ
Introduction to ArcGIS Workshops Fall 2009-Summer 2010		George Mason University
Hand Searching Systematic Review Workshop Fall 2009	Search Certifications	Cochrane Collaboration

AWARDS

<i>Independent Publisher Award, 2019</i>	Silver Medal for Current Events (Jihadi Next Door).
<i>Independent Publisher Award, 2018</i>	Bronze Medal for Social Issues/Humanitarian (Hidden in Plain Sight: America's Slaves of the New Millennium).
<i>Dissertation Completion Award, 2012</i>	George Mason University, College of Humanities and Social Sciences.
<i>Deans Challenge Award, 2009</i>	George Mason University, College of Humanities and Social Sciences.

SERVICE

Peer Reviewer	Office of Justice Programs (OJP), 2020-Present
Panel of Expert Witnesses	Los Angeles Superior Court, WI2017-Present
Reviewer	Journal of Human Trafficking, FA2014-Present
Invited Peer Reviewer	Office of Justice Programs, SP2020-Present
Advisory Board Member	Empower Her Network, FA2017- Present
Volunteer	Prince William County Police Santa Cops, WI2021
Advisory Board Member	Dressember (Anti-trafficking foundation), SP2017-SU2021

Reviewer	Taylor & Francis Books, SP2021
Reviewer	Justice Quarterly, WI2018- FA2019
Survey Methodologist Advisor	United Against Slavery, FA2017-FA2019
Member	Prince William County Human Trafficking Task Force, SU2013-SU2018
Member	Prince George's County Human Trafficking Task Force, SU2012-SU2014
Member and Former President	Soroptimist International of Woodbridge, FA2015-SP2018
Reviewer	American Journal of Evaluation, FA2014-FA2015
Member	Prince George's County Human Trafficking Task Force, SU2013-2015
Reviewer	Columbia University Press, FA2013
President and Founding Officer	Student Center for Immigration Research, George Mason University, FA2008 – FA2010
Member	Criminology, Law & Society Student Association, George Mason University, FA2009 – WI2012
Volunteer	Prince William County Jail, Classification Department, 500 hours, SP 2005

PROFESSIONAL MEMBERSHIP

National Society for Collegiate Scholars
Phi-Alpha Delta Pre-Law Fraternity
Alpha Chi Honors Fraternity
American Society of Criminology
National Criminal Justice Honors Fraternity
Alpha Phi Sigma Honors Society

APPENDIX B. Expert Witness Testimony

I have testified and/or issued a report in the following cases, but have been retained in many others:

Criminal Prosecution

United States of America v. Kamal Bhula, et al. United States District Court, For the District of New Mexico. Case No. 1:19-cr-01631-DHU

People of the State of California Plaintiff v. Mixon-Givens Santa Clara County Court

People of the State of California Plaintiff v. Joseph, et. Al. Contra Costa County Court (Case No: 5-160639-1)²⁵¹

People v. Kareem Abdur-Razzaaq, Ind. No. 3154/2013, Bronx County²⁵²

People v. Lemuel Skipper, Ind. No. 2409/2015, Bronx County²⁵³

Commonwealth of Virginia v. Corey Cardoza, Henrico County²⁵⁴

United States v. Cornelius Galloway, United States District of New Mexico²⁵⁵

State of Ohio v. Michael Moore, Lucas County Court (Case No. CR 16-3191)

Criminal Defense

United States of America v. Mei Xing, United States District Court for the Central District of California. No. 2:20-CR-0228(A)-FMO

People of the State of California v. Angelina Avila, Superior Court of the State of California, in and for the County of Los Angeles (Case No. BA508653-02)

United States of America v. Emonie Murphy, U.S. District Court for the Middle District of Pennsylvania

²⁵¹ Testified at grand jury on 4/13/2016 and at trial on 7/12/2017. Prosecutor's name is Aron DeFerrari: ADeferrari@contracostada.org.

²⁵² Testified at Frye motion for another expert witness on behalf of the prosecution.

²⁵³ Testified at Frye motion for another expert witness on behalf of the prosecution.

²⁵⁴ Testified at Daubert hearing and prevailed as an admitted expert. Case settled before trial.

²⁵⁵ Testified at Daubert hearing and prevailed as admitted expert.

[REDACTED]

People of the State of California Plaintiff v. Young Kyung Cho Superior Court of California, County of Los Angeles (Case No: 6CJ10198-01)²⁵⁶

United States of America v. Landrum et. Al. Via. U.S. District Court for the District of Arizona (Case No. 4:16-cr-01560-RM-JR)

The People of the State of California v. Rachele Eschenburg. Case Number: FCR350232

People of the State of California v. Diane Mirabal. Superior Court of the State of California for the County of Santa Clara. Case No.: 98312²⁵⁷

Civil Defense

M.H. v. G6 Hospitality LLC, et. al. 4:22-cv-198

Charity Pearrow v. ESA P Portfolio LLC, et. al. 21-cv-62276-BLOOM/Valle

K.R. v. 4200 Roosevelt LLC, et. al. Case Number 00552

C.A. v. 4200 Roosevelt LLC, et. al. Case Number 03355

B.H. v. 4200 Roosevelt LLC, et. al. Case Number 03356

K.C. v. 4200 Roosevelt LLC, et. al. Case Number 01926

T.E. v. 4200 Roosevelt LLC, et. al. Case Number 00994

V.S. v. 4200 Roosevelt LLC, et. al. Case Number 00997

Sherman, Gozun, and Nash v. Trinity Teen Solutions, Inc. Case Number 20-CV-215-SWS

N.Z. v. Knights of Trevose, et. al. Civil Action Number 02642

G.D. v. Knights of Trevose, et. al. Civil Action Number 02631

Jane Doe 1-4 v. Red Roof Inns, Inc., et. al. Civil Action Number 1:21-cv-04278-WMR

W.K., et. al. v. Red Roof Inns, Inc., et. al. Civil Action Number 1:20-cv-5263-VHC

J.A. v. Red Roof Inns, Inc., et. al. Civil Action Number 1:21-cv-03655-TWT

Casilao et. al. v. Hotelmacher LLC, et. al. Case No.: CIV-17-800-SLP

²⁵⁶ Testified in trial on 11/7/2016 and 12/2/2017.

²⁵⁷ Declaration only, not report.



S.Y. v. Inn of Naples Hotel LLC and Inn of Naples, LLC. Case No.: 2:20-cv-00609-JES

S.Y. v. Naples Hotel Company and the Gulfcoast Inn of Naples Owners Association, Inc. 2:20-cv-00608

C.S. v. Inn of Naples Hotel, LLC and Inn of Naples, LLC 2:20-cv-00629

C.S. v. Naples Hotel Company and the Gulfcoast Inn of Naples Owners Association, Inc. 2:20-cv-00631

M.B. v. Roosevelt Inn LLC (MARCH TERM, 2017 NO.: 00712)

Keo Ratha; Sem Kosal; Sophea Bun; Yem Ban; Nakry Phan; and Sok Sang v. Phatthana Seafood Co., Ltd; S.S. Frozen Food Co., Ltd.; Doe Corporations 1-5; Rubicon Resources, LLC; and Wales & Co. Universe, Ltd. United States District Court for the Central District of California.²⁵⁸

Jane Doe v. TRX Insurance Services, Inc and Richard Metz. United States District Court for the Eastern District of Pennsylvania. Civil Action No. 2:20-cv-04095-MMB

Heidi Gilbert, Amber Means, Mandy Meloon, Gabriela Joslin, and Kay Poe, v. U.S.A Taekwondo, Inc. and Steven Lopez. United States District Court for the District of Colorado. Civil Action No. 1: 18-cv-00981-CMA-MEH

Civil Plaintiff

Woodhull Freedom Foundation et al. v. United States²⁵⁹

Jane Doe v. Fairfax County Police 1:21cv1150(AJT/JFA)²⁶⁰

²⁵⁸ Also deposed in this case. Dismissed on summary judgement.

²⁵⁹ Not an expert witness report, but rather a declaration: <https://www.eff.org/document/declaration-dr-kimberly-mehlman-orozco-support-woodhull-et-al-motion-preliminary-injunction>

²⁶⁰ Pro Bono case, which has received national media attention. See, for example:

<https://www.newsweek.com/virginia-cops-protected-sex-trafficking-ring-return-free-sex-victims-lawsuit-1661937>

APPENDIX C. Materials Reviewed and Considered

In addition to the materials specifically cited or mentioned in my report, I considered the following documents in forming my opinions:

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Produced Document	CU_0003
Produced Document	CU_0005
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Third-Party Produced Document	Epstein Victims' Compensation Program, General Release Form, Confidential

Document Type	Description
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Deposition Exhibit	JDoe_JPMC_007438
Deposition Exhibit	JDoe_JPMC_000333
Deposition Exhibit	JDoe_JPMC_000334
Deposition Exhibit	JDoe_JPMC_007727
Deposition Exhibit	JDoe_JPMC_000332
Deposition Exhibit	Exhibit 7 to 3/3/2023 Deposition of Jane Doe 1
Deposition Exhibit	Exhibit 9 to 3/3/2023 Deposition of Jane Doe 1
Deposition Exhibit	JDoe_JPMC_000331
Deposition Exhibit	JDoe_JPMC_000319
Deposition Exhibit	JDoe_JPMC_000314
Deposition Exhibit	JDoe_JPMC_007837
Deposition Exhibit	JDoe_JPMC_000286
Deposition Exhibit	JDoe_JPMC_000261
Deposition Exhibit	JDoe_JPMC_000284
Deposition Exhibit	Jane Doe, LinkedIn Profile
Expert Report	March 1, 2023 Expert Report of Jane Khodarkovsky, 22-cv-10018, 22-cv-10019
Court Document	June 2, 2020 United States of America v. Wilhan Martono, Indictment, 20-cr-00274-N
Court Document	United States Department of Justice's Deferred Prosecution Agreement (DPA) with JPM Chase 2014
Court Document	Jane Doe 1, Individually and on behalf of all others similarly situated v. Deutsche Bank Aktiengesellschaft et al., First Amended Class Action Complaint, 22-cv-10018, January 13, 2023
Court Document	United States of America v. Wilhan Martono, Indictment, 20-cr-00273-N, June 2, 2020

Document Type	Description
Court Document	<i>In re Visa Check/MasterMoney Antitrust Litigation</i> , 280 F.3d 124 (2001)
Court Document	In the Matter of: JPMorgan Chase Bank, N.A. Columbus Ohio, Consent Order and Stipulation and Consent to the Issuance of a Consent Order, AA-EC-13-01, January 14, 2013
Court Document	Brunel v. Epstein, 14-21348-CA-01, Filing No. 22956396
Court Document	Brunel v. Epstein, 14-21348-CA-01, Filing No.54414493
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Court Document	Brunel v. Epstein, 14-21348-CA-01, Filing No.26472799
Court Document	Brunel v. Epstein, 14-21348-CA-01, Filing No.26696883
Court Document	Brunel v. Epstein, 14-21348-CA-01, 5/10/19 Mandate
Court Document	Brunel v. Epstein, 14-21348-CA-01, 7/24/2018, Defs. Suppl. Mot. to Dismiss
Court Document	Brunel v. Epstein, 14-21348-CA-01, Filing No.75393907
Court Document	Brunel v. Epstein, 14-21348-CA-01, Filing No.44858970
Court Document	Brunel v. Epstein, 14-21348-CA-01, Filing No.17175578
Court Document	Brunel v. Epstein, 14-21348-CA-01, 9/22/2014, Letter of Correspondence
Court Document	Brunel v. Epstein, 14-21348-CA-01, Filing No.79830224
Court Document	Brunel v. Epstein, 14-21348-CA-01, Filing No.100291718
Court Document	Brunel v. Epstein, 14-21348-CA-01, 10/31/2018, Order
Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 16
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Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 18

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Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 93
Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 93-1
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Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 104
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Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 105-1
Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 107
Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 107-1
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Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 107-3
Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 115
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Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 150-1
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Court Document	Doe v. Epstein, 08-cv-80893, Dkt. No. 185-4
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Court Document	Giuffre v. Dershowitz, 19-cv-3377, Dkt. No. 10-2
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Court Document	Giuffre v. Dershowitz, 19-cv-3377, Dkt. No. 101-1
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Court Document	Giuffre v. Dershowitz, 19-cv-3377, Dkt. No. 101-3
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Court Document	Giuffre v. Dershowitz, 19-cv-3377, Dkt. No. 149-1
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 24-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 24-2
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 47-3
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 55-1
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 55-10
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 55-12
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 65-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 65-2
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 65-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 65-5
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 66
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 69-1
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 153-7
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 161-7
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 482-1
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 621-5
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 621
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 634
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 645-1
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 645-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 645
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 656-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 656-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 656-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 656-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 656-5
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 656-6
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 656-7
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 656-9
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 656
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 660-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 660-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 660-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 660-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 660
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 678-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 678-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 678-3
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 680-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 680-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 680-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 680
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 682-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 682-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 682-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 682
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 684-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 684-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 684
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 687-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 687
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 694-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 694-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 694-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 694-4
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 694-6
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 694-7
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 715-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 715-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 715
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 723-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 723
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 727-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 727-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 727-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 727-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 727
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 729-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 729-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 729-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 729-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 729-5
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 729-6
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 729
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 739-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 739-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 739-3

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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 739
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 741-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 741-2
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 743-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 743-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 743-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 743-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 743-5
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 743-6
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 748-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 748-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 748-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 748-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 748-5
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 748
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 750-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 750-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 750-3
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 750-7
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 750-8
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 751-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 751-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 751-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 751-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 751-5
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 751-6
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 751-7
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 751-8
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 751-10
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 751-15
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 751-19
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 799-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 799-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 799-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 799
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 816-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 816-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 816-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 816-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 816
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 819-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 819-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 819
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 821-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 821-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 821-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 821
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 824

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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 828-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 828-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 828-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 828
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 831
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 839-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 839-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 839-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 839-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 839-5
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 839-6
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 839
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 847
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 849
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 851
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 877-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 877
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 879-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 879-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 879-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 879-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 879-5

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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 879-7
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 879
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 886-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 886-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 886-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 886
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 895-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 895-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 895-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 895-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 895-5
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 895-6
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 895-7
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 895
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 903
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 907-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 907-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 907-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 907-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 907-5
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 907-6

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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 907-8
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 907-9
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 907-10
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1050
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1150-3
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1206-1
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1206-5
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1206-7
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1206-9
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1206-10
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1206-11
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1295-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1295-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1295-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1295-4
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1295-11
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1295-12
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1295-13
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1296-1
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1296-2
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1296-3
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1296-4
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1296-5
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1296-6
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1296-7
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1296-8
Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1296-9
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1296-15
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Court Document	Giuffre v. Maxwell, 15-cv-07433, Dkt. No. 1296-17
Court Document	Giuffre v. Prince Andrew, 21-cv-06702, Dkt. No. 11
Court Document	Giuffre v. Prince Andrew, 21-cv-06702, Dkt. No. 11-1
Court Document	Giuffre v. Prince Andrew, 21-cv-06702, Dkt. No. 11-2
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Court Document	Giuffre v. Prince Andrew, 21-cv-06702, Dkt. No. 11-10
Court Document	Giuffre v. Prince Andrew, 21-cv-06702, Dkt. No. 11-11
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Court Document	Giuffre v. Prince Andrew, 21-cv-06702, Dkt. No. 11-13
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Court Document	Giuffre v. Prince Andrew, 21-cv-06702, Dkt. No. 35-1
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Court Document	Giuffre v. Prince Andrew, 21-cv-06702, Dkt. No. 35-4
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Court Document	Giuffre v. Prince Andrew, 21-cv-06702, Dkt. No. 35-6
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Court Document	Giuffre v. Prince Andrew, 21-cv-06702, Dkt. No. 38
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Court Document	Giuffre v. Prince Andrew, 21-cv-06702, Dkt. No. 42-1
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Court Document	Gov. USVI v. Estate of Jeffrey E. Epstein, ST-20-CV-14, 1/15/2020 Complaint
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Court Document	Gov. USVI v. Estate of Jeffrey E. Epstein, ST-20-CV-14, 7/1/2020, Pls. Reply
Court Document	Gov. USVI v. Estate of Jeffrey E. Epstein, ST-20-CV-14, 7/9/2020, Defs. Reply Brief
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Court Document	In re Courtney Wild, 994 F.3d 1244, Dkt. No. 65-1
Court Document	In re Courtney Wild, 994 F.3d 1244, Dkt. No. 68-1
Court Document	Doe v USA, 08-CV-80736, Dkt. No. 48-1
Court Document	Doe v USA, 08-CV-80736, Dkt. No. 48-2
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Court Document	Doe v USA, 08-CV-80736, Dkt. No. 48-4
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Court Document	Priscilla Doe v. Indyke and Kahn, 19-cv-07772, Complaint
Court Document	United States v. Epstein, 19-cr-00409, Dkt. No. 6-1
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Statute	Patriot Act Part 1
Statute	Patriot Act Part 2
Statute	31 U.S.C. § 5311, Bank Secrecy Act (BSA)
Statute	U.S.C. Title 31 - Money and Finance §310. Financial Crimes Enforcement Network
Statute	22 USCS § 7101. Purposes and findings
Statute	22 USCS § 7102. Definitions
Legal Treatise	§ 4:54. Recurring issues in the predominance analysis - Individual damages vs. common liability
Constitution	13th Amendment to the U.S. Constitution: Abolition of Slavery (1865), National Archives
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Public Records	Office of State Attorney Dave Aronberg Public Records, 01 06CF009454 Controlled Call from S.G. to [REDACTED].wav
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Psych Eval - Materials	Kliman_009
Psych Eval - Materials	Kliman_010
Psych Eval - Materials	Kliman_011

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Court Document	JPMC Interrogatory Responses in Lieu of 30(b)(6) Deposition Testimony
Deposition	Deposition of Stephen Cutler and exhibits
Deposition	Deposition of Maryanne Ryan and exhibits
Deposition	Deposition of Jamie Dimon and exhibits
Deposition	Deposition of James Staley and exhibits

Document Type	Description
Deposition	Deposition of Jordana Feldman and exhibits
Deposition	Deposition of Mary Erdoes and exhibits
Deposition	Deposition of Mary Casey and exhibits
Deposition	Deposition of William Langford and exhibits
Deposition	30(b)(6) Deposition of JPMorgan and exhibits
Deposition	Deposition of P.C. and exhibits
Deposition	Deposition of V.G. and exhibits
Deposition	Deposition of L.N. and exhibits
Court Document	JPMC Third Party Complaint Against Staley
Court Document	Jane Does Complaint and Amendments
Court Document	USVI's Complaint and Amendments
Expert Report	Expert Report of Jorge Amador and related exhibits
Court Document	Jane Doe 1 v. JPMorgan Chase Bank, N.A., No. 22-cv-10019, May 26, 2023 Hrg Tr.
Court Document	Jane Doe 1 v. JPMorgan Chase Bank, N.A., No. 22-cv-10019, Class Certification Order
Case	Giuffre v. Maxwell, No. 18- 2868 (2d Cir.)
Case	U.S. v. Ghislaine Maxwell, 20 CR 330 (AJN)
Case	United States v. Maksimenko, 2005-80187 (E.D. Mich.)
Case	People v. Epstein, 933 N.Y.S. 2d 239, 240 (N.Y. App. Div. 2011).
Case	Doe et al v. Epstein, 9:08-cv-80069-KAM (S.D. Fla.)
Case	Doe No. 3 v. Epstein, 9:08-cv-80232-KAM (S.D. Fla)
Case	Doe No. 4 v. Epstein, 9:08-cv-80380-KAM (S.D. Fla.)
Case	Doe No. 5 v. Epstein, 9:08-cv-80381-KAM (S.D. Fla.)
Case	Doe v. United States, 9:08-cv-80736-KAM (S.D. Fla.)
Case	Doe v. Epstein et al, 9:08-cv-80804-KAM (S.D. Fla.)
Case	C.M.A. v. Epstein et al, 9:08-cv-80811-KAM (S.D. Fla.)

Document Type	Description
Case	Doe v. Epstein, 9:08-cv-80893-KAM (S.D. Fla.)
Case	Jane Doe No. 7 v. Epstein, 9:08-cv-80993 (S.D. Fla.)
Case	Jane Doe No. 6 v. Epstein, 9:08-cv-80994 (S.D. Fla.)
Case	Doe II v. Epstein et al, 9:09-cv-80469-KAM (S.D. Fla.)
Case	Doe No. 101 v. Epstein, 9:09-cv-80591-KAM (S.D. Fla.)
Case	Doe No. 102 v. Epstein, 9:09-cv-80656-KAM (S.D. Fla.)
Case	Doe No. 8 v. Epstein, 9:09-cv-80802-KAM (S.D. Fla.)
Case	Podhurst Orseck, P.A. v. Epstein, 1:10-cv-21586-ASG (S.D. Fla.)
Case	Jane Doe No. 103 v. Epstein, 9:10-cv-80309-KAM (S.D. Fla.)
Case	C.L. v. Epstein, 9:10-cv-80447-KAM (S.D. Fla.)
Case	J. v. Epstein et al, 9:10-cv-81111-WPD (S.D. Fla.)
Case	Giuffre v. Maxwell, 1:15-cv-07433-LAP (S.D.N.Y.)
Case	Doe v. Trump et al, 1:16-cv-04642-RA (S.D.N.Y.)
Case	Jane Doe 43 v. Epstein et al, 1:17-cv-00616-JGK-SN (S.D.N.Y.)
Case	State of Florida v. Epstein, 502006 CF 009454 (Fla. Cir. Ct., 15th Cir., Palm Beach Cnty.)
Case	C.M.A. v. Epstein et al, 502008 CA 005240 (Fla. Cir. Ct., 15th Cir., Palm Beach Cnty.)
Case	Jane Doe II v. Epstein et al, 502008 CA 020614 (Fla. Cir. Ct., 15th Cir., Palm Beach Cnty.)
Case	A.C. v. Epstein et al, 502008 CA 025129 (Fla Cir. Ct., 15th Cir., Palm Beach Cnty.)
Case	L.M. v. Epstein et al, 502008 CA 028051 (Fla. Cir. Ct., 15th Cir., Palm Beach Cnty.)
Case	E.W. v. Epstein, 502008 CA 028058 (Fla. Cir. Ct., 15th Cir., Palm Beach Cnty.)
Case	B.B. v. Epstein et al, 502008 CA 037319 (Fla. Cir. Ct., 15th Cir., Palm Beach Cnty.)

Document Type	Description
Case	E.W. v. Jeffrey Epstein, 502008 CA 028058 (Fla. Cir. Ct. 15th Cir. Palm Beach Cnty.)
Case	L.M. v. Jeffrey Epstein, 09-cv-81092-KAM (S.D. Fla.)
Public Publication	Bridgette Carr, Anne Milgram, Kathleen Kim, and Stephen Warnath, Human Trafficking Law and Policy, LexisNexis (1st ed. 2014).
Public Publication	UN General Assembly, Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime, 15 November 2000, https://www.refworld.org/docid/4720706c0.html .
Public Publication	Hilary Axam and Jennifer Torrito Leonardo, "Human Trafficking: The Fundamentals," at 3. (US Department of Justice Nov. 2017).
Public Publication	In Harm's Way: How Systems Fail Human Trafficking Survivors, Survey Results from the First National Survivor Study, Polaris Project (January 2023), https://polarisproject.org/wp-content/uploads/2023/06/In-Harms-Way-How-Systems-Fail-Human-Trafficking-Survivors-by-Polaris.pdf . University of Nottingham Rights Lab, Photographing modern slavery: recommendations for responsible practices (December 2019), https://www.nottingham.ac.uk/research/beacons-of-excellence/rightslab/resources/reports-and-briefings/2019/november/photographing-modern-slavery.pdf .
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Public Publication	Amy Farrell, Meredith Dank, Ieke d Vries, Matthew Kaffafian, Andrea Hughes, Sarah Lockwood, Failing Victims? Challenges Of The Police Response To Human Trafficking, Criminology & Public Policy (July 31, 2019), https://doi.org/10.1111/1745-9133.12456 .
Public Publication	Recognizing the Signs, National Human Trafficking Hotline, https://humantraffickinghotline.org/en/human-trafficking/recognizing-signs .
Public Publication	Spot the Signs, Stop the Traffic, https://www.stopthetraffik.org/what-is-humantrafficking/spot-the-signs/ .
Public Publication	Identify and Assist a Trafficking Victim, US. Dep't of State https://www.state.gov/identify-and-assist-a-trafficking-victim/ .
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	https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_105023.pdf .
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Public Publication	Adult Human Trafficking Screening Tool and Guide, Dep't of Health & Human Servs. Admin. for Children & Families, (Jan. 2018), https://www.acf.hhs.gov/sites/default/files/documents/otip/adult_human_trafficking_screening_tool_and_guide.pdf .
Case Document	U.S. v. Jeffrey Epstein, 19 Cr. 490, Sealed Indictment, https://www.justice.gov/usaosdny/press-release/file/1180481/download .
Public Publication	U.S. v. Ghislaine Maxwell, 20 Cr. 330, Sealed Indictment, https://www.justice.gov/usaosdny/press-release/file/1291491/download .
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Public Publication	Trafficking in Persons Report 2009, U.S. Dep't of State (2009), https://2009-2017.state.gov/j/tip/rls/tiprpt/2009/index.htm .
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Public Publication	Meeghan Sheppard, Exposing the Exploitative Realities of Sugar Dating, Human Trafficking Search (2020), https://humantraffickingsearch.org/resource/exposing-theexploitative-realities-of-sugar-dating/
Public Publication	Bridgette Carr, Dr. Munro-Kramer, Human Trafficking Training Module for Healthcare Providers and Advocates, https://humantrafficking.umich.edu/education/continuingeducation-module/ .
Public Publication	Raising the Standard In Private Banking Service, JPMorgan, https://privatebank.jpmorgan.com/gl/en/o/raising-the-standard-in-private-bankingservice?utm_source=jpmwm-sem-bing&utm_medium=all-exact&utm_campaign=us-enservices-acq&utm_content=servicesdesktopna&gclid=5884947618661f3de0b1f07ea4b7e39f .

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Public Publication	Personal Banking, JPMorgan, https://privatebank.jpmorgan.com/gl/en/services/banking/personal-banking .
Public Publication	Ghislaine Maxwell Sentenced To 20 Years In Prison For Conspiring With Jeffrey Epstein To Sexually Abuse Minors United States Attorney's Office, Southern District of New York, (June 28, 2022), https://www.justice.gov/usao-sdny/pr/ghislaine-maxwell-sentenced-20-years-prison-conspiring-jeffrey-epstein-sexually-abuse .
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Public Publication	The Associated Press, Jeffrey Epstein Associate Jean-Luc Brunel Is Found Dead in a French Jail Cell, NPR (Feb. 19, 2022), https://www.npr.org/2022/02/19/1081961087/jeffrey-epstein-jean-luc-brunel-dead .
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Public Publication	Vanity Fair, Prince Andrew: Ties to Jeffrey Epstein and His Tenuous Position in "the Firm" (June 29, 2011), https://www.vanityfair.com/news/2011/06/prince-andrew-ties-tojeffrey-epstein-and-his-tenuous-position-in-the-firm .
Public Publication	Jessica, Jeffrey Epstein Gets Off With a Little Help From His Friends, GAWKER (July 27, 2006), https://www.gawker.com/190237/jeffrey-epstein-gets-off-with-a-little-helpfrom-his-friends .
Public Publication	Nolan Hamilton, Jeffrey Epstein Kept Company in Jail By His Alleged Lesbian Sex Slave, GAWKER (July 22, 2009), https://www.gawker.com/5320323/jeffrey-epstein-keptcompany-in-jail-by-his-alleged-lebian-sex-slave .
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Public Publication	Refuse To Say If They Even Know Royal, DAILYMAIL (Mar. 7, 2011), https://www.dailymail.co.uk/news/article-1363701/Prince-Andrew-named-sex-quiz-Jeffrey-Epsteins-aides-refuse-say-know-royal.html .
Statute	18 U.S.C. § 1591(e)(6)

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Statute	22 U.S.C. § 7102(11)(A), (12)
Statute	22 U.S.C. § 7102(3)
Statute	22 U.S.C. § 7102(4)
Statute	22 U.S.C. § 7102(11)(B)
Case	<i>Casilao v. Hotelmacher LLC</i> , Case No. CIV-17-800-M; <i>Francis v. Apex, USA</i> , Case No: CIV-18-583-HE
Case	<i>In re Aarica S.</i> , 223 Cal. App. 4th 1480 (Cal. Ct. App. 2014)
Case	<i>In re M.D.</i> , 231 Cal. App. 4th 993 (Cal. Ct. App. 2014)
Case	<i>In re M.V.</i> , 225 Cal.App.4th 1495 (Cal. Ct. App. Jul. 27, 2012)
Case	<i>In re N.C.</i> , 4 Cal. App. 5th 1235 (Cal. Ct. App. 2016)
Statute	New York Penal Law §130.20
Statute	New York Penal Law §130.35
Case	<i>Noble v. Weinstein</i> , 335 F. Supp. 3d 504, 524 (S.D.N.Y. 2018)
Case	<i>Rathav. Phatthana Seafood Co.</i> , Case No. 16-2-28453-1 KNT
Court Document	Transcript of Record at 3176:5, <i>United States v. Maxwell</i> , 20-cr-00330-AJN (S.D.N.Y. Dec. 29, 2021)
Court Document	Trial testimony from <i>United States v. Mei Xing</i> , No. 2:20-CR-0228(A)-FMO. (C.D. Cal.)
Court Document	Verdict Sheet, <i>United States v. Maxwell</i> , 20-cr-00330-AJN (S.D.N.Y. Dec. 19, 2021), ECF No. 565
Deposition Transcript	Laura Newman Dep. Tr., May 5, 2023
Deposition Transcript	Pralaya Cuomo Dep. Tr., Mar. 3, 2023
Deposition Transcript	Stephen Cutler Dep. Tr., May 24, 2023
Expert Report	Expert Report of Bridget Carr and related exhibits
Expert Report	Expert Report of Terry Pesce
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Public Publication	Soderlund, Gretchen. Sex trafficking, scandal, and the transformation of journalism. University of Chicago Press, 2013)
Public Publication	Song, S., <i>When Anti-Sex Trafficking Policies like the Marriott's Do More Harm Than Good</i> , Paper Magazine (Jan. 30, 2019), retrieved from: https://www.papermag.com/marriott-hotels-sex-trafficking-training-2627520121.html?rebellitem=9#rebellitem9 .
Public Publication	Sweileh, W.M., <i>Research trends on human trafficking: a bibliometric analysis using Scopus database</i> , Global Health vol. 14, 106 (2018), retrieved from: https://doi.org/10.1186/s12992-018-0427-9
Public Publication	Thomas Brewster, <i>Sex Traffickers Used America's Favorite Family Safety App To Control Victims</i> , Forbes (April 6, 2023), retrieved from: https://www.forbes.com/sites/thomasbrewster/2023/04/06/sex-traffickers-use-parenting-apps-like-life360-to-spy-on-victims/?sh=92d15c864c3a
Public Publication	Trafficking in Persons Report U.S. Dep't of State (2009), https://2009-2017.state.gov/j/tip/rls/tiprpt/2009/index.htm
Public Publication	Trafficking in Persons Report U.S. Dep't of State (2010), https://2009-2017.state.gov/j/tip/rls/tiprpt/2010/142761.htm
Public Publication	U.N. Office on Drugs and Crime, Human Trafficking FAQs, retrieved from: https://www.unodc.org/unodc/en/human-trafficking/faqs.html
Public Publication	U.S. Dep't of State, Off. to Monitor & Combat Trafficking in Persons, <i>The Role of the Financial Sector: Promising Practices in the Eradication of Trafficking in Persons</i> , (June 2021), retrieved from: https://www.state.gov/wp-content/uploads/2021/06/The-Role-of-the-Financial-Sector-Promising-Practices-in-the-Eradication-of-Trafficking-in-Persons_LOW.pdf
Public Publication	U.S. Dep't of Transportation, Blue Lightning Initiative, retrieved from: https://www.transportation.gov/administrations/office-policy/blue-lightning-initiative
Public Publication	U.S. Dep't of Treas., <i>FinCEN, Advisory: Guidance on Recognizing Activity that May be Associated with Human Smuggling and Human Trafficking – Financial Red Flags</i> , (Sept. 11, 2014), retrieved from: https://www.fincen.gov/sites/default/files/advisory/FIN-2014-A008.pdf

Document Type	Description
Public Publication	U.S. Dep't of Treas., <i>FinCEN, Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity</i> , (Oct. 15, 2020), retrieved from: https://www.fincen.gov/sites/default/files/advisory/2020-10-15/Advisory%20Human%20Trafficking%20508%20FINAL_0.pdf
Public Publication	U.S. Department of Justice, Office of Justice Programs, National Institute of Justice, <i>Overview of Human Trafficking and NIJ's Role</i> , retrieved from: https://nij.ojp.gov/topics/articles/overview-human-trafficking-and-nijs-role
Public Publication	United Nations Office on Drugs and Crime (UNDOC) Sharing Electronic Resources and Laws on Crime (SHERLOC) database, available here: https://sherloc.unodc.org/cld/en/v3/sherloc/cldb/index.html
Public Publication	United Nations, <i>Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime</i> , (2000), retrieved from: https://www.ohchr.org/sites/default/files/ProtocolonTrafficking.pdf
Public Publication	United States v. Anton Joseph Lazzaro. https://www.justice.gov/usao-mn/press-release/file/1424071/download .
Public Publication	Van der Laan, P. H., Smit, M., et al., <i>Cross-border Trafficking in Human Beings: Prevention and Intervention Strategies for Reducing Sexual Exploitation</i> , Campbell Systematic Reviews (2011)
Public Publication	Victims of Trafficking and Violence Protection Act of 2000, Pub. L. No. 106-386, H.R. 3244 (2000)
Public Publication	Wang, B., Black Aurora woman questioned for trafficking white sister at Dallas airport, Denver7 (July 21, 2021), retrieved from: https://www.thedenverchannel.com/news/local-news/black-aurora-woman-questioned-for-trafficking-white-sister-at-dallas-airport
Public Publication	Weiner, Eric, <i>The Long, Colorful History of the Mann Act</i> , NR, (March 11, 2008), retrieved from: https://www.npr.org/2008/03/11/88104308/the-long-colorful-history-of-the-mann-act
Public Publication	William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008, Pub. L. No. 110-457, H.R. 7311 (2008).
Public Publication	Wilson, J.M. & Dalton, E., <i>Human Trafficking in the Heartland: Variation in Law Enforcement Awareness and Response</i> , Journal of Contemporary Criminal Justice (2008)

APPENDIX D. ILO Operational Indicators of Commercial Sexual Exploitation of Children

Indicators of trafficking of children for sexual exploitation

Exploitation is inherent to the situation of children under 18 used or offered for prostitution or pornography and there is no need for indicators to prove it. The indicators of additional exploitation below are given to characterize other elements of exploitation children may suffer. In addition, the Palermo Protocol specifically states that, in the case of children, there is no need to prove "the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability" in order to establish the crime of trafficking. Nevertheless, it was decided to retain indicators of deception, coercion and abuse of vulnerability in order to analyse trafficking in children with harmonised tools within Europe.

INDICATORS OF DECEPTIVE RECRUITMENT

Strong Indicator

Deceived about the nature of the job or location

Medium Indicators

Deceived about access to education opportunities

Deceived about conditions of prostitution

Deceived about content or legality of work contract

Deceived about family reunification

Deceived about housing and living conditions

Deceived about legal documentation or obtaining legal migration status

Deceived about travel and recruitment conditions

Deceived about wages/earnings

Deceived through promises of marriage or adoption

General context

Personal situation

Psychological and emotional dependency

Relationship with authorities/legal status

INDICATORS OF ADDITIONAL EXPLOITATION

Strong Indicator

Hazardous work

Medium Indicators

Bad living conditions

Excessive working days or hours

Low or no salary

No social protection (contract, social insurance, etc.)

Very bad working conditions

Wage manipulation

INDICATORS OF COERCIVE RECRUITMENT

Strong Indicators

Abduction, forced marriage, forced adoption or selling of victim

Debt bondage

Isolation, confinement or surveillance

Threats of violence against victim

Violence on victims

Medium Indicators

Confiscation of documents

Threat of denunciation to authorities

Threats to inform family, community or public

Violence on family (threats or effective)

Withholding of money

INDICATORS OF COERCION AT DESTINATION

Strong Indicators

Confiscation of documents

Debt bondage

Forced into illicit/criminal activities

Forced tasks or clients

Isolation, confinement or surveillance

Threats of violence against victim

Under strong influence

Violence on victims

Medium Indicators

Forced to act against peers

Forced to lie to authorities, family, etc.

Threat of denunciation to authorities

Threat to impose even worse working conditions

Threats to inform family, community or public

Violence on family (threats or effective)

Withholding of wages

INDICATORS OF RECRUITMENT BY ABUSE OF VULNERABILITY

Medium Indicators

Abuse of cultural/religious beliefs

Abuse of difficult family situation

Abuse of illegal status

Abuse of lack of education (language)

Abuse of lack of information

Control of exploiters

Difficulties in the past

Difficulty to organise the travel

Economic reasons

False information about law, attitude of authorities

False information about successful migration

Family situation

INDICATORS OF ABUSE OF VULNERABILITY AT DESTINATION

Strong Indicator

Dependency on exploiters

Medium Indicators

Difficulties in the past

Difficulty to live in an unknown area

Economic reasons

Family situation

Personal characteristics

Relationship with authorities/legal status

APPENDIX E. ILO Operational Indicators of Commercial Sexual Exploitation of Adults

Indicators of trafficking of adults for sexual exploitation

INDICATORS OF DECEPTIVE RECRUITMENT

Strong Indicator

Deceived about the nature of the job or location

Medium Indicators

Deceived about conditions of prostitution

Deceived about content or legality of work contract

Deceived about family reunification

Deceived about housing and living conditions

Deceived about legal documentation or obtaining legal

migration status

Deceived about travel and recruitment conditions

Deceived about wages/earnings

Deceived through promises of marriage or adoption

Weak Indicator

Deceived about access to education opportunities

Personal situation

Psychological and emotional dependency

Relationship with authorities/legal status

Weak Indicator

Abuse of cultural/religious beliefs

INDICATORS OF EXPLOITATION

Medium Indicators

Bad living conditions

Excessive working days or hours

Hazardous work

Low or no salary

No respect of labour laws or contract signed

No social protection (contract, social insurance, etc.)

Very bad working conditions

Wage manipulation

INDICATORS OF COERCIVE RECRUITMENT

Strong Indicators

Abduction, forced marriage, forced adoption or selling of victim

Debt bondage

Threats of violence against victim

Violence on victims

Medium Indicators

Confiscation of documents

Isolation, confinement or surveillance

Threat of denunciation to authorities

Threats to inform family, community or public

Violence on family (threats or effective)

Withholding of money

INDICATORS OF COERCION AT DESTINATION

Strong Indicators

Confiscation of documents

Debt bondage

Forced tasks or clients

Isolation, confinement or surveillance

Threats of violence against victim

Violence on victims

Medium Indicators

Forced into illicit/criminal activities

Forced to act against peers

Forced to lie to authorities, family, etc.

Threat of denunciation to authorities

Threat to impose even worse working conditions

Threats to inform family, community or public

Under strong influence

Violence on family (threats or effective)

Withholding of wages

INDICATORS OF RECRUITMENT BY ABUSE OF VULNERABILITY

Medium Indicators

Abuse of difficult family situation

Abuse of illegal status

Abuse of lack of education (language)

Abuse of lack of information

Control of exploiters

Difficulties in the past

Difficulty to organise the travel

Economic reasons

False information about law, attitude of authorities

False information about successful migration

Family situation

General context

Indicators of abuse of vulnerability at destination

Medium Indicators

Dependency on exploiters

Difficulty to live in an unknown area

Economic reasons

Family situation

Personal characteristics

Relationship with authorities/legal status

Weak Indicator

Difficulties in the past

APPENDIX F. Summary of Operational Indicator Protocols on Commercial Sexual Exploitation

Tool	Creator	Year
Operational Indicators of Trafficking in Human Beings	International Labour Organization	2009
Comprehensive Human Trafficking Assessment Tool	Polaris Project	2011
Screening Tool for Victims of Human Trafficking for Law Enforcement	US Department of Health and Human Services, Administration for Children, Youth and Families (ACYF)	n.d.
Law Enforcement Screening Tool for Victims of Human Trafficking	Office of the Attorney General, Nevada	n.d.
Trafficking Victim Identification Tool (TVIT)	Vera Institute for Justice	2014
Adult Human Trafficking Screening Tool and Guide	US Department of Health and Human Services, Administration for Children, Youth and Families (ACYF)	2018

APPENDIX G. Sample of Michigan Law Center Human Trafficking Case Summaries²⁶¹

Case Name	Summary
<i>United States v. Josue Flores Carreto</i>	<p>Defendants operated a transnational sex trafficking ring between the United States and Mexico. Defendants compelled victims, women and girls from Mexico, to work as prostitutes in brothels in the New York City area.</p> <p>The defendants smuggled the victims, who were often poor and uneducated, into the United States. Once here, defendants controlled the victims through threats, fraud, forced abortion, and physical violence, including sexual abuse. <u>The women were forced to turn over almost all of their profits to the defendants.</u></p>
<i>United States v. Antonia Jimenez-Calderon</i>	<p>Beginning around November 2000, Defendants Antonia and Librada Jimenez-Calderon conspired with other defendants to prostitute at least four juvenile girls in a Plainfield, New Jersey, brothel. The victims were recruited in Mexico by Delfino and Luis Jimenez-Calderon, the siblings of Antonia and Librada. According to charging documents, Delfino and Luis lured impoverished and uneducated girls with gifts and promises of marriage. Delfino and Luis sexually assaulted at least two of the victims. As of August 2003, the two men had yet to be taken into custody by U.S. authorities.</p> <p>Defendant Angel Ruiz owned and operated the brothel; there, he was assisted by Defendants Maritzana Diaz-Lopez and Pedro Garcia Burgos. The Jimenez-Calderon sisters became involved in the brothel through Burgos.</p> <p>Once the girls had been smuggled into the United States, Antonia and Librada used threats and physical abuse to force them to work seven days a week. <u>The victims were forced to turn over all their earnings from prostitution to the defendants running the brothel.</u> Antonia and Librada constantly monitored the girls and forbid them to speak to anyone outside defendants' presence; the judge who sentenced Antonia and Librada compared the victims' existence to that of "caged-animal".</p> <p>The brothel, which included adult prostitutes, was raided by local law enforcement in February 2002.</p> <p>Defendants Antonia and Librada pleaded guilty to sex trafficking and were sentenced 210 months imprisonment. Defendants Ruiz, Diaz-Lopez and Burgos also pleaded guilty to sex trafficking. Sergio Farfan pleaded guilty to obstruction of justice; he was charged after presenting, at the behest of Antonia and Librada, fraudulent birth certificates to secure the release of the juvenile victims who had been arrested in the police raid.</p>
<i>United States v. Deric Willoughby</i>	<p>Defendants Deric Willoughby, Brandy Shope, Jennifer Huskey were indicted for forcing, over a period of 10 days, two minor girls (ages 14 and 15) to prostitute themselves at a Michigan truck stop and at hotels in Toledo, Ohio. Defendant Willoughby provided the girls with false identities, which they were instructed to use in the case they were detained by law enforcement. According to a Department of Justice press release, Willoughby controlled the victims through threats and physically assaults. <u>Shope and Huskey monitored the girls, collected money from</u></p>

²⁶¹ Provided by the Michigan Law Center on or about 2012. Currently available online through the United Nations Office on Drugs and Crime (UNDOC) Sharing Electronic Resources and Laws on Crime (SHERLOC) database, available here: <https://sherloc.unodc.org/cld/en/v3/sherloc/cldb/index.html>.

	<p><u>patrons, and also participated in commercial sex acts that the girls were forced to perform.</u> Authorities alleged that Defendant Gordon, a truck driver, transported the victims to a Michigan truck stop, where he engaged in commercial sex with one of the girls. Defendant Willoughby pleaded guilty to interstate transportation of minors for prostitution and conspiracy.</p>
<i>United States v. Jimmie Lee Jones</i>	<p>From 2000 to 2005, Defendant Jones, also known as "Mike Spade," coerced and forced a number of young women, including juveniles under the age of 18, to engage in commercial sex acts. Jones recruited victims at colleges, restaurants, nightclubs, and other public venues by promising to help them pursue work as models and exotic dancers. According to a Department of Justice press release, Jones <u>convinced at least five of the girls to sign contracts under which they agreed to pay Jones hundreds of dollars per week to help build their modeling careers.</u> Jones then used physical violence and threats of physical violence to coerce the victims into engaging in commercial sex acts. Additionally, the defendant controlled and manipulated the victims by threatening their financial security and threatening to release sexually explicit videotapes of the victims. Jones was sentenced to 15 years imprisonment for conspiracy to engage in sex trafficking and for transporting persons across state lines for purposes of prostitution.</p>
<i>United States v. Victor Powell</i>	<p>Defendant Victor Powell pleaded guilty to transporting a minor across state lines for the purpose of prostitution. Defendant used physical abuse, including sexual assault, to force four minors to engage in commercial sex. <u>Defendant kept all the money that the victims earned.</u></p>
<i>United States v. Niam Jorge Tovar</i>	<p>Defendant, a Mexican citizen, convinced a 16-year-old Mexican girl that he loved her and she should come with him to the United States. He obtained fake documents for her, and arranged for them both to be smuggled into Houston, Texas. Once they were in Houston, the defendant told the victim that she would have to "work in an apartment," which she thought meant she would have to do housework. But the defendant explained to her that <u>she would have to work in a brothel as a prostitute, and turn over all the money she made to him.</u> He threatened her with violence if he did not obey him. Some reports suggested that the defendant also coerced other girls into doing the same thing. The 16-year-old victim told a relative living in Houston what was happening to her, and that relative called the Houston police.</p>
<i>United States v. Jerome E. Todd</i>	<p>Defendant was charged with the sex trafficking of four adult women. The <u>women initially worked for defendant voluntarily as prostitutes, but defendant compelled their continued employment by beatings and threats.</u> After recruiting, and then emotionally and physically abusing an eighteen-year-old victim, defendant coerced the victim into "grooming" other victims on how to behave as prostitutes for the defendant. The defendant placed ads in Craigslist and Seattle Weekly advertising the sexual availability of the victims. Defendant was found guilty by a federal jury of trafficking and other related charges and sentenced to 312 months imprisonment. He was also ordered to pay \$68,500 in victim restitution.</p>
<i>United States v. Gladys Vasquez Valenzuela</i>	<p>Defendants operated a large-scale sex-trafficking ring in the Los Angeles area. According to a press release from the Department of Justice, the defendants used promises of legitimate jobs to lure vulnerable Guatemalan women - including minors - into the United States. After smuggling the women into the United States, the defendants forced the victims to engage in prostitution to pay off smuggling debts of as much as \$20,000. <u>The defendants collected all the money the victims earned.</u> To control and manipulate the victims, the defendants threatened the victims and the victims' families in Guatemala and exploited the victims' fears of witch doctors.</p> <p>Five defendants - Gladys Vasquez Valenzuela, Gabriel Mendez, Mirna Jeanneth, Vasquez Valenzuela, Maria de los Angeles Vicente, Maribel Rodriguez Vasquez -</p>

	were found guilty by a federal jury of trafficking and trafficking-related charges and received sentences ranging from 30 to 40 years in prison. Four additional defendants - Albertina Vasquez Valenzuela, Luis Vicente Vasquez, Pablo Bonifacio, Flor Morales Sanchez – pleaded guilty to charges related to the trafficking scheme and received sentences ranging from 24 to 71 months in prison.
<i>United States v. Shannon Marie Wild</i>	According to information provided in the appellate record, Defendant Wild transported three minor females from Oklahoma to Texas for the purposes of prostituting the victims. Once the girls were in Texas, Wild told the victims that they would have to earn money from prostitution if they wanted to return to Oklahoma. Wild threatened to kill one of the victims if she revealed to anyone that Wild had prostituted her. One victim testified that she had as many as 10 “dates” in a day; some of the johns were recruited by Wild in local bars. During the period when they were exploited from April 2003 to July 2003, <u>the victims turned over all of the money they earned to Wild</u> . Wild was arrested after one of the victims was able to contact her mother by telephone, who then contacted law enforcement officials. A federal jury found Defendant Wild guilty of sex trafficking and transporting a minor across state lines with the intent that the minor engage in prostitution. She was sentenced to 121 months imprisonment. After two years on the run following his indictment, Defendant Gutierrez pleaded guilty to charges relating to the trafficking scheme. According to media reports, Wild shared with Gutierrez profits from the victims’ commercial sex acts. He was sentenced to 121 months imprisonment.
<i>United States v. Raul Santillan-Leon</i>	Defendants operated a string of brothels in Memphis, Tennessee. Defendants recruited and coerced women and girls from Mexico, Dominican Republic, Colombia and the United State to work as prostitutes. Defendants recruited, under false pretenses, at least two minor girls from Mexico to come to the United States. Once here, the girls were coerced into engaging in commercial sex.
<i>United States v. Jacobo Dominguez Vazquez</i>	All three defendants pled guilty to smuggling a 13 year-old girl into the United States from Mexico for the purpose of prostituting the victim. The men coerced the girl into prostituting herself to repay her "smuggling" fee, which was upwards of \$2000. The defendants solicited business in Jackson, Wyoming, operating out of motels in the area. <u>The three defendants kept all the money earned by the victim</u> . The defendants fled with the girl to Phoenix, Arizona, after an altercation between the defendants and customer resulted in a call to the police. The defendants remained in Arizona for eighteen months before returning to Jackson; however, police were not able to track down the defendants until a year after their return to Jackson. Authorities believe that the girl was forced to prostitute herself throughout the two years that she was in defendants' custody. Authorities also suspect that the defendants enticed other women and girls to travel from Mexico to the United States as part of a larger trafficking ring, although no further charges have been made.
<i>United States v. Shannon Blaylock</i>	According to the indictment, Defendants Seaton, Blaylock, and Gardner trafficked a 17-year old minor female in the San Francisco area. The indictment charged that Blaylock and Seaton purchased a bus ticket for the victim and arranged for her to travel from Louisiana to San Francisco. Once there, Defendant Gardner helped the victim to prepare for prostitution by, among other acts, helping the victim with her make-up. Blaylock and Seaton arranged for the victim to engage in commercial sex with male client and <u>collected money that the victim earned</u> .

	Defendants Seaton and Blaylock were convicted by a federal jury of sex trafficking of a minor and conspiracy to commit sex trafficking of a minor. Charges against Defendant Gardner were dismissed.
<i>United States v. George Anderson III</i>	Defendant was convicted of the sex trafficking of two teenage girls in the Houston area, one 15 years old and one 16. He operated as their pimp, <u>collecting all of the money made from prostituting the two girls</u> in exchange for providing hotel rooms, cell phones, clothes, food and other goods. There was no evidence of physical abuse or coercion. He was found and arrested after the two girls were arrested for prostitution. The available record is unclear regarding whether the girls were ever charged with any crimes.
<i>United States v. Kasiem Brown</i>	Defendants ran a prostitution business in Newark, New Jersey. They forced minors and adult women into prostitution with violence and threats of violence. <u>Defendants took all the money the women made</u> , arranged their appointments with men and provided the women with clothing, cell phones and housing.
<i>United States v. Dennis Paris</i>	Paris was convicted on various counts of conspiracy, sex trafficking of a minor, sex trafficking through force, fraud or coercion, money laundering, and racketeering related to a prostitution ring he was found to operate in Hartford, Connecticut. He called the ring an "escort service" and claimed the sexual acts performed were the result of independent arrangements between the victims and the clients: the victims did them, Paris argued, for extra money or their own enjoyment. <u>Paris shared the victims and the proceeds from their "calls" with other defendants</u> . He claimed these defendants were his competitors. The court found they were his co-conspirators. Cell phone and credit card use contributed to the conspiracy and money laundering convictions. Physical abuse of and verbal threats to the victims led to the coercion charge. Paris was found to have consciously avoided knowing the victim's age.
<i>United States v. Ivan Salazar</i>	The six charged defendants, all Mexican citizens, lured young Mexican girls and women into the United States under false pretenses and then forced them into prostitution. In one case, a minor victim was smuggled while she was still 15 and forced into prostitution by Jose Luis Moreno Salazar who had lured her from her family by claiming his love for the girl and promising to marry her. Once in the US, the women were forced into prostitution in Houston area bars, through physical violence and threats. The defendants maintained their control over the women through threats of harm, physical force and psychological coercion. The beatings were done with a belt, a wire hanger or a cable. The victims lived in apartments leased by the defendants and were transported to bars for the purposes of prostitution. <u>The defendants collected from the women and girls all of their prostitution proceeds</u> . The sex trafficking organization operated from the early months of 2004 until the summer of 2005. Defendant Gerardo "El Gallo" Salazar, the uncle of Angel Moreno Salazar and the father of Juan Carlos Salazar, was the leader of the sex trafficking organization.
<i>United States v. Robert Williams</i>	Defendants used a minor for prostitution activities in Massachusetts, Maine, Connecticut, Rhode Island, and New Hampshire. The girl was 13 to 15 years old during the crimes and was taking calls from defendant Young's escort service. The escort service operated both online and over the phone. <u>Defendants took all or almost all of the minor's earnings</u> . Defendants helped the teenager obtain false identification documents. The victim was reported missing in 2001, when she was 14 years old. The defendants, aware of the missing status of the child, called the National Center for Missing and Exploited Children in 2001 to report that the minor was safe. Defendant Williams appealed his sentence to assert that his acts were a

	"joint venture" between the victim and himself, and therefore not a "violent" act. The court dismissed this line of reasoning and held that violation of the prohibition on sex trafficking of minors ""constitutes a crime of violence.
<i>United States v. Juan Reyes Rojas</i>	The three defendants, all Mexican nationals, are brothers who forced one 16-year-old girl and another teenager from Mexico to come to the United States with promises of legitimate employment. Defendants used a combination of physical abuse, threats, and isolation to force both victims to prostitute themselves in Atlanta, Georgia. One of the victims was lured to the United States with promises of long-term romance. The victims were forced to perform commercial sexual acts with between 10 and 25 men per day. <u>Defendants kept all of the proceeds.</u> Brothers Jose Reyes Rojas and Juan Reyes Rojas were both sentenced to between 57 and 71 months incarceration; Raul Reyes Rojas remains a fugitive on the run.
<i>United States v. Ezekiel Hampton</i>	Authorities began investigating Defendant when one victim reported that she was being pimped out by Defendant. Defendant recruited girls, an unspecified number of which were minor runaways, and provided shelter, food, alcohol, and drugs to victims. In exchange, victims placed advertisements on craigslist for sexual services and prostituted themselves on the streets. <u>Victims were required to give all money made through prostitution to Defendant.</u> Defendant also used victims to package and deliver crack cocaine. Victims were threatened and beaten if they disobeyed Defendant. The case was originally a state case, but was adopted by the government and Defendant was charged in federal court. Original co-defendant was severed from the case and charged in state court with several drug-related charges that were dismissed. Defendant was sentenced to 13 years in prison and 10 years of supervised release.
<i>United States v. Carlos Andres Monsalve</i>	In 2005, the defendant began smuggling Latin American women into the United States from Costa, Rica, Columbia, and Guatemala for between \$15,000-\$20,000 per woman. Once in the United States, Monsalve forced the women to work as prostitutes to pay off their smuggling fees. While most of the women knew they would work as prostitutes, at least two victims were promised legitimate work. The women were expected to work between 6 and 7 days per week, and have sex with between 20 and 25 men per night. <u>The women charged \$30 for 15 minutes of sex, with defendant keeping \$15 and applying the other \$15 to the debt.</u> In one instance, victims 1 and 2 refused to engage in prostitution and were threatened with deportation if they went to the police. After the debt was repaid, the women could continue working for defendant as prostitutes under the same profit sharing agreement.
<i>United States v. Cha</i>	Guam police officers received a report from a woman, S.S., who said that the defendant Ms. Cha, the owner of a karaoke bar ("The Blue House Lounge"), had S.S.'s passport and refused to return it. The woman also said that two of her cousins, S.S.(2) and D.R., were being held inside the bar against their will. Police officers went to the bar to investigate and found one cousin in a back room with a man whose pants were "barely on." When the police officer spoke to the two women outside they began crying and reported that they had been prostituted against their will. Ms. Cha had <u>confiscated their passports and refused to feed them unless they had sex with customers.</u> Cha and her co-defendants were charged with a conspiracy to recruit approximately 9 victims from Micronesia- mostly poor and uneducated, and including one 16-year-old girl- to come to the United States. Once in the United States, Cha forced the victims to work in "VIP" sex rooms for 12 to 14 hours per day.
<i>United States v. Johnny Saintil</i>	Defendants, part of an organization called Please Talk Paper (PTP), recruited women and minor girls to serve as prostitutes. They advertised their prostitutes on Backpage.com and operated out of national and international hotel chains in two Florida counties (mostly Broward, occasionally Miami-Dade). Members of PTP

	<p>included pimps and head prostitutes (called "bottoms"), and members collaborated with each other regarding internet advertising, surveillance at the hotels, and detection of law enforcement. They also shared condoms, computers, and prostitutes. <i>Three of the defendants worked as pimps, and the other two worked as head prostitutes ("bottoms")</i>. All five defendants entered into plea agreements.</p>
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